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Filed Electronically

March 1, 2024

Debbie-Anne A. Reese
Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Kern River No. 3 Hydroelectric Project, FERC Project No. 2290-122; Request to File Study Results

Dear Acting Secretary Reese:

Southern California Edison (SCE) is the owner and operator of the Kern River No. 3 (KR3) Hydroelectric Project (Project), Federal Energy Regulatory Commission (Commission or FERC) Project No. 2290. SCE is providing the enclosed information in response to FERC's February 1, 2024, letter requesting additional results from ongoing studies in the Project's relicensing process.

Concurrent with filing this letter with FERC, SCE is distributing a copy to Stakeholders via email with a link to the filing in addition to posting the supplemental study response on SCE's public relicensing website at www.sce.com/kr3.

BACKGROUND

In accordance with FERC's regulations (18 CFR § 5.15(c)(1)), SCE filed its Initial Study Report (ISR)¹ with FERC on October 9 2023, which described the overall progress in implementing the 20 FERC-approved Study Plans, including a summary of study results that were available at that time, together with a description of any variances and proposed modifications to the FERC-approved plans. As many of the studies were a work-in-progress at the time of the ISR (and will continue with data collection through spring/summer 2024), SCE provided a summary of data collection efforts to date in the form of Interim Technical Memorandum as part of the ISR.

In response to Stakeholder comments on the ISR filing, on February 1, 2024, FERC requested that SCE file the Level 1 Structured Interview Questionnaire results associated with the *REC-1 Whitewater Boating Study* (Attachment A) and a summary of the spot and calibration count data collected as part of the *REC-2 Recreation Facilities Use Assessment Study* (Attachment B) within 30 days (i.e., by March 2, 2024).

¹ SCE (Southern California Edison). 2023. *Kern River No. 3 Hydroelectric Project (FERC Project No. 2290), Initial Study Report*. October 9, 2023.

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REC-1 WHITEWATER BOATING STUDY

In the February 1 letter, FERC staff requested results of the Level 1 Structured Interview Questionnaire to supplement the other Level 1 and Level 2 study data provided in the *REC-1 Whitewater Boating Interim Technical Memorandum*, included as part of the ISR filing, is used to better inform recommendations for implementing the Level 3 Study. Staff explained that they will use this additional information in the 2024 Study Plan modification determination to determine whether a Level 3 study is necessary and, if so, which of the study types (i.e., controlled flow study, multiple flow reconnaissance assessment, or a flow comparison study) should be implemented. The information requested by FERC staff appears in Attachment A.

For clarification, SCE's Revised Study Plan (RSP)² already includes SCE's implementation of a Level 3 Intensive Study to obtain the necessary information for developing flow preference curves. The RSP includes the Level 3 multiple flow reconnaissance and flow comparison approaches described in Whittaker et al. (2005).³ These approaches are also identified as outstanding tasks in the REC-1 Interim Technical Memorandum and summarized in the Level 3 Intensive Study Implementation section within Attachment A of this filing.

In 2024, SCE will complete the following elements of the Level 3 Intensive Study:

- Analysis of the Level 3 whitewater single flow survey (data collected in 2023 and the analysis distributed to Stakeholders in Q1 2024 as an addendum to the REC-1 interim Technical Memorandum).
- Provide enhanced flows targeting knowledge gaps in boater experience on the river segments in the Fairview Dam Bypass Reach.
- Deploy a whitewater flow comparison survey.
- Conduct a whitewater focus group; and
- Complete a hydrology analysis to quantify the annual number of whitewater boating days using flow preference curves from Level 1, Level 2, and Level 3 data.

SCE has not proposed to conduct a Level 3 controlled flow study due to Project infrastructure constraints and limited ability to control the upper range of potential boating flows, as described below:

- Limitation of Project infrastructure. The impoundment behind Fairview Dam (less than 2 acres) does not provide storage for the Project to augment or withhold instream flows. The conveyance flowline may offer some flow adjustments but is limited in overall volume (approximate maximum diversion of 600 cubic feet per second [cfs]) and other operational restrictions such as ramping rates.
- Uncontrolled inflows. The NFKR upstream of Fairview Dam is free flowing (i.e., no other impoundments). Coupled with the uncertainty of the snowmelt hydrograph of the NFKR

² SCE (Southern California Edison). 2022. *Kern River No. 3 Hydroelectric Project (FERC Project No. 2290), Revised Study Plan*. July 1, 2022.

³ Whittaker, D., B. Shelby, and J. Gangemi. 2005. *Flows and Recreation: A Guide to Studies for River Professionals*. Washington, DC: Hydropower Reform Coalition and National Park Service Hydropower Recreation Assistance Program.

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(volume of snowpack and seasonal timing of snowmelt), the precise scheduling and ability to control the flow volume may present logistical challenges.

- Controlled flow study experimental design requirements. The experimental design requirements for a controlled flow study (an alternative Level 3 approach by Whittaker et al. [2005]), require a consistent team of boaters to evaluate the full range of flows over a short period of time (2 to 3 days). Furthermore, Whittaker et al. (2005) also point out that controlled flow studies are better suited for a single river segment. The 16-mile bypass reach contains eight whitewater river segments varying in difficulty and length and thus fails to meet the recommendation in Whittaker et al. (2005). In addition, the range of flows identified in Levels 1 and 2 of this study that warrant investigation in the Level 3 study greatly exceed the 600 cfs diversion capacity of the conveyance flowline. Structured Interview respondents identified flow preferences ranging from 90 cfs to 8,500 cfs. The Project infrastructure is incapable of providing any controlled flows that exceed the 600 cfs capacity of the flow conveyance line.

Refer to Attachment A, REC-1 Whitewater Boating Study: Level 1 Structured Interview Analysis, for a summary of these study results and for SCE's recommended flow enhancement opportunities.

REC-2 RECREATION FACILITIES USE ASSESSMENT STUDY

As requested by Commission staff in their February 1 letter, the Level 1 structured interview questionnaire results for REC-1 appear in Attachment A, and the additional spot and calibration count information appear in Attachment B. As documented in SCE's ISR filing¹, the installation of trail cameras at U.S. Forest Service recreation facilities was not feasible. Therefore, SCE increased the number of spot counts and added calibration counts as part of this study. SCE added 23 2-hour calibration count days between June 2023 and March 2024, and an additional 28 spot count days, which increases the total number of spot counts to 61 days over the course of the year-long study. In addition, as stated in SCE's ISR Response to Comments filing on January 9, 2024,⁴ SCE proposed to extend the spot counts and 2-hour calibration counts at the non-fee day use/dispersed camping recreation sites in the study area (1 weekday/weekend day in April and May 2024 and 1 day of the 3-day Memorial Day weekend).

Attachment B includes additional information regarding the amount and type of data collected regarding recreation use in the Project Area. This data includes a count of the number of people and vehicles observed during the spot counts conducted as part of the on-site visitor intercept survey and calibration count days broken down by month and day type. Also included is a preliminary breakdown of information from the calibration counts, including the observed length of stay at a facility and the number of people and vehicles observed. Attachment B also discusses how this information will be used to evaluate recreation use, including the amount of recreation use at each site, the types of recreation activities at each site, and estimated future recreational demands.

⁴ SCE (Southern California Edison). 2024. *Kern River No. 3 Hydroelectric Project (FERC Project No. 2290), Initial Study Report Response to Comments*. January 9, 2024.

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NEXT STEPS

As provided in the Revised Process Plan and Schedule issued by Commission staff in their February 1 letter⁵, Stakeholders will have until April 1, 2024, to file any additional disagreements or further requests to amend the above-referenced Study Plans in light of the additional information provided by SCE. SCE then has 30 days (i.e., until May 1, 2024) to respond to any additional disagreements or study requests filed by Stakeholders. Commission staff will then consider all these filings and issue a determination on disagreements and study requests on or before May 31, 2024.

SCE has agreed to provide supplemental information to Stakeholders outside of the Integrated Licensing Process reporting schedule and distribute addendums to the Technical Memoranda associated with the *REC-1 Whitewater Boating Study*, *REC-2 Recreation Facilities Use Assessment Study*, and *OPS-1 Water Conveyance Assessment* in the first quarter of 2024. SCE will continue with the second study season data collection scheduled through spring/summer 2024 for ongoing/outstanding study elements and per staff's resolution of any disagreements. SCE will provide updated Technical Memoranda for any study and data analyses completed before SCE files the Draft License Application, which SCE will file by July 3, 2024. Any remaining study results from the 2023 to 2024 study season will be provided in the Updated Study Report filed with FERC by October 11, 2024.

SCE looks forward to continuing to work with Commission staff and Stakeholders as the Project relicensing proceeds. If you have any questions regarding this filing, please contact David Moore, SCE Project Manager, via email at david.moore@sce.com.

Sincerely,

DocuSigned by:

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Wayne P. Allen
Principal Manager

Enclosures:

- Attachment A: REC-1 Whitewater Boating Study: Level 1 Structured Interview Analysis
- Attachment B: REC-2 Recreation Facilities User Surveys: Calibration and Spot Count Summary
- Attachment C: Distribution List

⁵ Federal Energy Regulatory Commission (FERC) Revised Process Plan and Schedule, FERC Accession No. 20240201-3018. Issued February 1, 2024.