



# FISH PASSAGE CENTER

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## MEMORANDUM

TO: Agnes Lut, Oregon Department of Environmental Quality  
Andrew Kolosseus, Washington Department of Ecology

*Michela Sethart*

FROM: Fish Passage Center Staff

DATE: June 2, 2008

RE: BPA comments on the FPC Analysis of Spill Volume

We are responding to the BPA March 4, 2008 email comments on the Fish Passage Center's February 6, 2008 analysis of spill volumes. At the request of the Adaptive Management Team the FPC conducted an analysis of the additional spill volume that might be expected to occur if the waiver criteria did not include the forebay monitors as a point of compliance. To accomplish this task the FPC used empirical data from representative flow years and provided a range of volumes under different spill management scenarios.

The BPA comments basically point to the fact that the FPC analysis removes involuntary excess generation spill from the base case, while BPA would choose to retain this involuntary spill in the base case. Consequently, the difference between the base case and the modeled scenarios in the analysis show a larger difference in the potential volume spilled when the forebay monitors are not used, than the BPA calculation.

The FPC analysis specifically removed excess generation spill from the base case when it exceeded the amount of spill required by the Fish Passage Plan, or exceeded the amount of spill defined by a gas cap. This excess generation in the empirical data is a function of river flows and market capacity at the time the data was collected. Because BPA tries to market all available energy on a real time basis and is continually making efforts to expand their markets, there is no way of guaranteeing that this volume of spill will occur in future years. Since neither the amount, nor the timing (seasonal or daily), of excess generation spill can be predicted or guaranteed, The FPC does not recommend that it be included in the analysis.

In conclusion, by retaining excess generation spill in their calculations BPA causes the difference between the base case and spilling to 120% to be considerably smaller than the FPC prediction. This, in turn, would translate to a smaller fish benefit when it is modeled in COMPASS.