

POTTER VALLEY IRRIGATION DISTRICT
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November 28 ,2025

Via Electronic Submittal (E-Filing)

Secretary Debbie-Ann A. Reese
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: MOTION TO INTERVENE AND COMMENTS for Potter Valley Project No. 77-332
by the Potter Valley Irrigation District (PVID) in response to the October 31, 2025
NOTICE OF APPLICATION FOR SURRENDER OF LICENSE AND NON-PROJECT
USE OF PROJECT LANDS, ACCEPTED FOR FILING, SOLICITING COMMENTS,
MOTIONS TO INTERVENE AND PROTESTS**

Dear Secretary Reese,

The Potter Valley Irrigation District (PVID) wishes to COMMENT and MOVES TO INTERVENE in the matter of Pacific Gas and Electric Company's (PG&E) filing dated July 25, 2023 with the Federal Energy Regulatory Commission (Commission) entitled Potter Valley Hydroelectric Project (FERC Project No.77) Final Application for Surrender of License and Final Application for Non-Project Use of Project Lands.

Since 1922, when Scott Dam was built on the Eel River forming Lake Pillsbury, the community of Potter Valley has benefitted from water diverted from the Eel River in the summer through the Potter Valley Hydropower Project (Project). Recognizing the value of newly available summer water for our farming community, the citizens of Potter Valley formed PVID in 1924, constructed a system of canals that could deliver water to all of the land on the valley floor, and signed a contract with Snow Mountain Water and Power Company (SMWP) to purchase the water diverted through the Project. In 1930, PG&E purchased the Project from SMWP and assumed the water delivery contract with PVID.

Of all the communities in the Russian River watershed that have benefitted from Project water, the community of Potter Valley is uniquely dependent upon this year-round inter-basin diversion. The watershed of Potter Valley is only seven miles long and a few miles wide. Natural surface water flows in the valley normally cease by mid-June. However, as water leaves the

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November 26, 2025

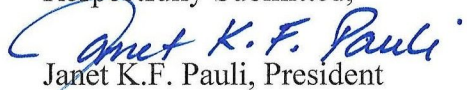
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tailrace of the Project in the summer, after being stored in Lake Pillsbury during the winter, it can be directly diverted into the East and West Canals of the PVID delivery system. Other water users downstream of the Project are allowed to divert the water released during the summer into the East Branch of the Russian River (EBRR) using Appropriative Water Rights granted by the California State Water Resources Control Board (SWRCB). After Coyote Valley Dam was completed downstream of Potter Valley in 1959, Project water began to be stored in the newly formed Lake Mendocino. Water stored in Lake Mendocino is beneficially used by the communities of Redwood Valley, Calpella, Ukiah, Talmage and Hopland in Mendocino County. Water stored in Lake Mendocino is an essential component of the water used farther downstream for the northern Sonoma County communities of Cloverdale, Geyserville, Healdsburg and Alexander Valley. To a lesser degree all of the communities below the confluence with Dry Creek along the Russian River, including Marin County, also use Project water that has been stored in Lake Mendocino. The existence of Project water has allowed a thriving agricultural economy to exist, has provided the towns and businesses along the Russian River with a dependable water supply, and has been used to augment minimum instream flows protective of listed species of fish for over 100 years.

PVID has a vital interest in PG&E's application filed with the Commission for surrender of their license and the non-project use of project lands. PVID strongly supports the application for non-project use of project lands which will allow coordination between PG&E and the Eel-Russian Project Authority (ERPA) during the concurrent removal of Cape Horn Dam and construction of a replacement diversion called the New Eel Russian Facility (NERF). In order to replace the summer water supply that is currently available for use from Lake Pillsbury, it is essential that additional water storage projects are identified and constructed in, and downstream of, Potter Valley. Several storage option investigations are underway for Potter Valley and a Feasibility Study has been initiated with the United States Army Corps of Engineers to identify a project that could increase the water storage capacity of Lake Mendocino.

Due to the potential impacts of the proposed license surrender, PVID formally files these COMMENTS AND A MOTION TO INTERVENE in the matter of FERC Project No.77-332 Pacific Gas and Electric Company's surrender application for non-project use of project lands.

Respectfully Submitted,



Janet K.F. Pauli, President

Potter Valley Irrigation District