

NMFS Regional Administrator; UNITED STATES)
 FISH & WILDLIFE SERVICE; Nancy Gloman,)
 Chief, USFWS; Ann Badgely, Regional Director,)
 USFWS; UNITED STATES DEPARTMENT OF)
 INTERIOR; and, Bruce Babbitt, Secretary, USDO)
)
 Defendants.)
)
 AND)
)
 Public Utility District No. 1 of Pend Oreille)
 County, Washington,)
)
 Intervenor.)
)

DEFENDANTS' ANSWERS TO PLAINTIFF'S INTERROGATORIES

Interrogatory No. 1:

How many kilowatts of electricity are currently generated by the operations of the Albeni Falls Dam.

Answer: Table 1 (see below) summarizes the actual generation that occurred at Albeni Falls Dam from 1994 through present. Generation is shown in Megawatt-months which is the average generation in megawatts (1,000 kilowatts) across a month. Actual daily and hourly generation values at Albeni Falls fluctuated.

Interrogatory No. 2:

How many kilowatts would be generated per year operating the Albeni Falls Dam in conformance with Plaintiff's demands as set forth in their Complaint?

Answer: Table 2 (see below) summarizes an estimate of generation at Albeni Falls that would have occurred if the project was operated according to the Plaintiff's demands. The operation assumed that the Hope Gage would be held at elevation 2055 feet from 20 November until spring refill was initiated and that Hope Gage would be operated above 2062 feet through 15 September drafting no lower than 2061 feet by 30 September. The Plaintiff's operation was compared to the actual operation of Albeni Falls from 1994 through present.

The change in generation at Albeni Falls was commensurate with the additional water stored, or released, in the fall by drafting to 2055 ft. The change in water releases was converted to

Table 1. Albeni Falls Actual Total Generation in Megawatt Months

Month	2001	2000	1999	1998	1997	1996	1995	1994
Jan	17	22	25	24	28	30	15	18
Feb	12	21	24	20	29	28	23	17
Mar		23	29	23	24	19	34	18
Apr		19	28	29	17	8	29	21
May		23	22	29	0	2	36	34
Jun		44	17	37	4	8	35	44
Jul		39	41	43	44	41	39	21
Aug		22	32	30	37	36	24	14
Sep		25	27	28	35	29	26	18
Oct		30	28	29	34	31	32	28
Nov		20	25	26	29	26	15	18
Dec		19	24	23	27	25	19	14
Totals		306	321	343	308	284	326	265

Table 2. Albeni Falls Adjusted Total Generation in Megawatt Months based on Plaintiff's Proposed Operation

Month	2001	2000	1999	1998	1997	1996	1995	1994
Jan	18	24	25	24	28	30	18 +	24 +
Feb	13	23	24	20	29	28	23	21 +
Mar		25	29	23	24	19	34	23
Apr		23	28	29	17	8	29	27
May		23	22	29	0	2	36	34
Jun		44	17	37	4	8	35	44
Jul		39	41	43	44	41	39	21
Aug		22	32	30	37	36	24	14
Sep		21	30	25	32	26	23	16
Oct		32	25	32	37	34	34	29
Nov		18	24	26	29	26	18	18
Dec		21	19	23	27	25	26	17
Totals		315 +9	316 -5	342 -1	308 0	283 -1	339 +	288 +

1. Assumed at site h/k-values from Final Regulation 2000 - 2001
2. Assumed MW difference from change in head as derived from Turbine rating table
3. Assumed Plaintiff operation was 2055' from 20 Nov - spring refill and above 2062 through 15 Sep drafting no lower than 2061 by 30 Sep