

# 1 Project Management Plan

## 2 *Central Valley Project Improvement Act Finance Plan*

### 3 Version History

4 April 14, 2014 – Initial Template

5 April 18, 2014 – Initial Draft for review by Western in Preparation for Meeting with NCPA

6 April 25, 2014 – Incorporation of Agency comments for coordinated development with NCPA

7 May 22, 2014 – Incorporation of Program Manager comments for Project Team Review.

### 8 Introduction

9 This Project Management Plan (PMP) expands on the Project Charter to describe the U.S. Bureau of  
10 Reclamation (Reclamation) framework for accomplishing the goals and objectives of Central Valley  
11 Project Improvement Act (CVPIA) Finance Plan (Project). Reclamation will take the lead and will  
12 coordinate with the U.S. Fish and Wildlife Service (Service) consistent with the principle of joint  
13 implementation of the CVPIA.

14 The purpose of this Project is to address the “Pathway to Proportionality” and other issues related to  
15 collections from Central Valley Project (CVP) power customers (Power) for the CVP Restoration Fund and  
16 federal expenditures under CVPIA authorities regardless of funding source. The goals and objectives  
17 section of this PMP describes the specific needs.

18 Reclamation developed this PMP to identify expectations between Reclamation and the involved parties  
19 on:

- 20 • The proposed approach to the Project;
- 21 • Participants and methods of coordination; and
- 22 • The management of risks.

23 This PMP is intended to be a living document updated as necessary during the development of the  
24 Project to reflect actual conditions. This PMP serves as a coordination tool, will remain draft, and does  
25 not commit Reclamation or other project participants to any course of action.

### 26 Authority

27 Title 34 of Public Law 102-575, the Central Valley Project Improvement Act, authorizes the collection of  
28 funds from water and power customers under section 3407. Programs and projects affected by this  
29 Project are anticipated to include the actions under sections 3406(b) – “Fisheries”, 3406(d) – “Refuges”,  
30 and 3406(g) – “Modeling”, and the San Joaquin River Restoration Program authorized by Title X of Public  
31 Law 111-11. During the course of implementation, the Project Team may identify additional authorities  
32 to accomplish the goals and objectives.

### 33 Project Management Approach

34 The project management approach describes the underlying intent and principles used to develop the  
35 process for achieving the goals and objectives of this Project. The approach for this Project emphasizes  
36 collaboration in the development of products and recognizes that the diversity of stakeholders means

1 that coming to a final recommendation will likely require elements of negotiation. The approach will  
2 facilitate negotiation through the development of incremental steps that provide for exploring different  
3 outcomes prior to the need to come to a decision.

4 The approach will also seek rapid development of products and prioritize meeting deadlines. Where  
5 possible, this Project will recognize and attempt to maximize uses of the extensive work to date. This  
6 Project will also seek to use coordination methods that minimize the potential for differences of  
7 opinions to cause delay.

## 8 Background

9 The Secretary (of the Interior) is directed to impose such charges as required to collect \$50 million (1992  
10 price levels subject to certain limitations. Of the financing mechanisms established by the CVPIA, only  
11 the "mitigation and restoration payment" collections from CVP water and power contractors provided  
12 substantial funding. Mitigation and restoration payments are limited to no more than \$30 million (1992  
13 price levels), no more than \$6 per acre foot from agricultural water users and \$12 per acre foot from  
14 municipal and industrial water users (both 1992 price levels), ability of water users to pay, and, taking  
15 into account all funds collected under this title, to the greatest degree practicable, be assessed in the  
16 same proportion, measured over a ten-year rolling average, as water and power users' respective  
17 allocations for repayment of the Central Valley Project.

18 The historical practice for collections maximized the revenue from water deliveries and required power  
19 customers to fund the remaining requirements. Power has disproportionately contributed 33% into the  
20 Restoration Fund compared to a cost allocation to power of 24% between 2002 and 2012. In 2004, the  
21 expiration of a contract with Pacific Gas and Electric substantially increased the cost to generate and  
22 deliver project power. In 2009, a year with low water deliveries, the costs of acquiring project power  
23 exceeded the equivalent market rate. Costs of project power exceeded the market rate again in 2012  
24 and may exceed the market rate in the future and undermine the viability of CVP power.

25 Collections for the CVPIA Restoration Fund (Fund) comprise approximately 1/4 to 1/3 of the costs to  
26 generate CVP power. The Northern California Power Agency (NCPA) and Western Area Power  
27 Administration (Western) raised the issue in 2005 and began work with Reclamation in 2010 on this  
28 current effort to maintain the viability of project power (and related revenue for the Restoration Fund)  
29 and achieve collections proportional to the cost allocation.

## 30 Scope

31 The scope shall include the analysis, coordination, policies, and agreements necessary to accomplish the  
32 purpose of this Project. This Project is intended to address the specific issues raised by project power,  
33 result in changes to Restoration Fund collections, and cause adjustments to the implementation of the  
34 CVPIA. Undertaking the adjustments to the CVPIA may require separate longer-term projects that  
35 address potential reductions in collections and could include measures to remedy the larger lack of  
36 sufficient financing for the CVPIA. This project could develop scopes for those efforts, but would only  
37 undertake those actions that can be completed on schedule.

38 Reclamation will retain decision making authority in coordination with the Service. Policy guidance and  
39 acceptance of the final work products will remain with the Regional Directors of Reclamation and the  
40 Service.

41 Execution may require legislative actions. The Project Team shall not initiate contact with legislators or  
42 their representatives as a part of this Project, but may identify potential legislative remedies. Nothing in

1 this Project is intended to limit the actions of any agency or stakeholder participants independent of this  
2 Project.

### 3 **Goals and Objectives**

4 Goals and objectives describe the overall need and the specific criteria for measuring the successful  
5 completion of this Project. The goal is to collaborate with stakeholders to develop a finance plan for the  
6 CVPIA addressing collections, expenditures, and anticipated accomplishments. Successful completion of  
7 this Project would provide a plan that addresses, in no particular order:

- 8 1. Completion Criteria: definition of the conditions that allow for a reduction in collections under  
9 section 3407(d)(2).
- 10 2. Proportionality: collections in proportion to the cost allocation.
- 11 3. Sustainability: total costs of project power competitive with market rates such that contractors  
12 renew agreements to purchase CVP power.
- 13 4. Stability: minimize fluctuation in Power payments from year to year.
- 14 5. Accomplishments: funding levels and strategies for the Fish Resource Area, Refuge Water Supply  
15 Program, Habitat Restoration Program, San Joaquin River Restoration Program, Trinity River  
16 Restoration Program, and Ecosystem and Water Operations Modeling Program.
- 17 6. Reimbursability: potential cost recovery through water and power rates.
- 18 7. Irrigator Ability to Pay: Potential effects of relief to irrigators, based on ability to pay, that would  
19 be borne by power contractors.

20 This Project represents a good faith effort by all parties to develop a finance plan for the CVPIA. This  
21 Project may not resolve all issues from all parties to their complete satisfaction, but may serve to better  
22 define differences and reconcile potential issues to a greater extent than possible without this Project.  
23 This Project should recognize the substantial efforts already taken to identify completion criteria.

### 24 **Technical Process**

25 The technical process describes the work breakdown for how this Project will achieve the goals and  
26 objectives. This Project will seek to develop a complete finance plan for the CVPIA including revenues,  
27 expenditures, and accomplishments. This technical process focuses on incrementally building towards a  
28 Decision Support Memorandum to outline alternatives and make a recommendation. The final decision  
29 on a finance plan will be documented as a guidance memorandum documenting the procedures and  
30 practices for implementing the CVPIA.

31 The approach intends to provide a complete understanding of the effects of proposed changes and the  
32 implications to the operations of Reclamation, the Service, other agencies, and stakeholders so that  
33 decision makers can take action. The methods are intended to bracket an expansive range of options so  
34 as to provide the most space for creative discussion and then narrow down to alternatives. Developing  
35 a range of options will look at strategies for the individual components of the CVPIA and then seek to  
36 combine and moderate the different strategies into a balanced plan with expectations on performance.  
37 The technical process intends to draw heavily on prior work and existing information to accelerate the  
38 schedule. The process will develop through the followings steps:

- 39 1. Historical Practices: documentation of current and historical practices for the financing and  
40 expenditures under the CVPIA and resulting accomplishments. This is anticipated to have been  
41 largely completed with the CVPIA Program Accomplishments Review report, draft CVPIA

1 Contractor Financial Obligations, Impacts, and Challenges report; Expenditures, Credits, and  
2 Offsets reports; and Accomplishment reports to Congress.

- 3 2. Revenue Options: documentation of different options for collecting payments for the  
4 Restoration Fund. Each option should use historical water delivery information to provide an  
5 analysis of payments under the proposed methods and the effects upon water and power users.  
6 The intent is to provide a thorough understanding of approaches to the revenue components of  
7 the finance plan. This step will result in a Revenue Options Technical Memorandum that will be  
8 included as an appendix to the Decision Support Memorandum.
- 9 3. Program Component Options: documentation of the different individual efforts financed by the  
10 Restoration Fund or using the CVPIA authorities. Each unique effort under the CVPIA will  
11 document options for implementation and the resulting effects. The intent is to provide a  
12 thorough understanding of approaches to program and project implementation in terms of  
13 activities, costs, relationships to agency missions, and options for moving forward. This step will  
14 result in a Program Component Options Technical Memorandum that will be included as an  
15 appendix to the Decision Support Memorandum.
- 16 4. Strategy Themes: documentation of combinations of program components, and the required  
17 revenues, to accomplish narrowly defined objectives that do not consider the whole of the  
18 CVPIA, e.g. RPA actions only, fish monitoring only, etc. The intent is to provide a thorough  
19 understanding of how programs and projects can be combined to accomplish broader missions  
20 and goals that span multiple program components. This step will result in a Strategy Themes  
21 Technical Memorandum that will be included as an appendix to the Decision Support  
22 Memorandum.
- 23 5. Finance Plan Initial Alternatives: merger and modification of strategy themes to develop  
24 complete alternatives and the associated revenues, accomplishments, and effects on water and  
25 power rates. Not all initial alternatives may be feasible or preferred by all parties. This step will  
26 result in an Initial Alternatives Technical Memorandum that will be included as an appendix to  
27 the Decision Support Memorandum.
- 28 6. Decision Support Memorandum: merger and modification of the initial alternatives to provide a  
29 range of viable alternatives to decision makers and the consequences of different decisions. The  
30 intent is to document a range of approaches that highlight the tradeoffs and to make a  
31 recommendation. Approaches would be presented to Reclamation and Service management for  
32 a decision on how to proceed. This step will result in a Decision Support Memorandum that  
33 includes appendixes with supporting information.
- 34 7. Guidance Memorandum: formal documentation of the decision on the finance plan for the  
35 CVPIA and all necessary supporting information.

36 Subsequent sections provide additional details on each of the steps.

### 37 Historical Practices

38 The agencies already completed extensive work on historical practices. Specific information on  
39 historical practices under the CVPIA will review the collection of existing information including the:

- 40 • Program Environmental Impact Statement,
- 41 • CVPIA Program Activities Review (CPAR) Report,
- 42 • Draft Contractor Financial Obligations Report (CFOR),

- 1 • Fisheries and Refuge Independent Reviews,
- 2 • Financial Reports to Congress,
- 3 • Expenditures, Credits and Offsets (ECO) Reports,
- 4 • Accomplishment Reports to Congress, and
- 5 • Annual Work Plans

6 No additional documentation is anticipated at this time, but some new information may be required  
7 depending on subsequent deliverables.

8  
9 The purpose of the Revenue Options Technical Memorandum (TM) is to provide background  
10 information, in support of the CVPIA Finance Plan, on implementation of the mechanisms for collections  
11 into the Central Valley Project Restoration Fund. The analysis in the Revenue Options TM provides  
12 baseline information for assessing options on funding.

13 Development of the TM will proceed on a modular basis by considering each of the mechanisms  
14 provided for in the CVPIA and options on policies and methods for implementation. Methods provided  
15 for under the Act include:

- 16 • Tiered Pricing – Section 3405(d): differences between contract rates and full cost rate for  
17 quantities over 80% of the contract total.
- 18 • Mitigation and Restoration Payments – Section 3407(c)-(d): collections into the Restoration  
19 Fund from water and power contractors. These mechanisms should address all relevant  
20 provisions within the Act including:
  - 21 ○ (c)(2) : direction to collect \$50 million (October 1992 price levels) subject to,
  - 22 ○ (d)(2)(A): water and power payments shall not exceed \$30 million (October 1992 price  
23 levels) on,
  - 24 ○ (d)(2)(A): a three-year rolling average basis, and
  - 25 ○ (d)(2)(A): payments shall be allocated so as not to exceed \$6 per acre-foot (October  
26 1992 price levels) for agricultural water sold and delivered by the Central Valley Project,  
27 and \$12 per acre-foot (October 1992 price levels) for municipal and industrial water sold  
28 and delivered by the Central Valley Project, and
  - 29 ○ (d)(2)(A): The amount of the mitigation and restoration payment made by Central Valley  
30 Project water and power users, taking into account all funds collected under this title,  
31 shall, to the greatest degree practicable, be assessed in the same proportion, measured  
32 over a ten-year rolling average, as water and power users' respective allocations for  
33 repayment of the Central Valley Project.

34 Mechanisms should also consider appropriations language: *the Bureau of Reclamation is*  
35 *directed to assess and collect the full amount of the additional mitigation and restoration*  
36 *payments authorized by section 3407(d) of Public Law 102–575.*

1 Mechanisms should also consider practical limitations on the ability to anticipate water  
2 deliveries and how collections should manage higher or lower than anticipated revenues.

- 3 • Water Transfer Charges – Section 3405(a)(1)(B): water transferred to a non-CVP contractor for  
4 irrigation or municipal and industrial uses.

5 Anticipated actions would include, but are not limited to, potential policy modifications to increase use  
6 of tiered water, potential alternative interpretations of the mitigation payment language and/or  
7 adjustments to policies, and a review of historical water transfers. Analysis of each option for the above  
8 mechanisms should include:

- 9 • Estimated annual revenue based on historical water delivery information broken down by costs  
10 to water and costs to power.
- 11 • Comparison to historical collections from water and power.
- 12 • Estimated impacts on power costs and comparison to historical market rates and one or more  
13 forecast future scenarios if possible.
- 14 • Comparison to historical expenditures to demonstrate the resulting effects on credits and  
15 offsets to reimbursable expenses.
- 16 • Estimated effects on water and power rates, if any.
- 17 • Points of potential conflict on the interpretation of the existing legislation and alternative policy  
18 approaches to resolve differences.

19 Reclamation and the Service also use or have used CVPIA authorities to conduct activities required  
20 under Biological Opinions and in addressing requirements for regulatory activities such as the state  
21 Water Quality Control Plan. Other funds include:

- 22 • Central Valley Project,
- 23 • California Bay-Delta Restoration,
- 24 • American Recovery and Reinvestment Act,
- 25 • State of California Funds, and
- 26 • Donations.

27 Subsequent steps within the PMP will align potential revenue options with program expenditures to  
28 develop complete finance plan alternatives.

29 Revenue Options would be developed by a specific sub-group with one or more individuals taking the  
30 lead on individual options and supported by Reclamation's Finance Division staff. The TM may describe  
31 options considered and rejected. Each potential revenue option should provide a complete procedural  
32 description of the process Reclamation would follow in assessing collections.

33

## Program Component Options

The purpose of the Program Component Options Technical Memorandum (TM) is to provide background information, in support of the CVPIA Finance Plan, on the different activities authorized by the CVPIA, services provided by those activities, and alternative budget strategies. The analysis in the TM provides baseline information for assessing options on programs and consequences.

Development of the TM will proceed on a modular basis, program by program. Each program will define the range of potential approaches by identifying extremes as represented by different options. These options will include, at minimum:

- Fully Funded: a description of the maximum resources a program could reasonably expend to accomplish the goals and objectives of the program without an increase in total CVPIA staffing.
- Maintain Current Practice: a description of current or “typical” conditions.
- Switch Funding Authorities: alternative existing or potentially new legislative authorities for implementing the activity.
- Maintenance Level: a description of minimal activities that holds the status quo, but makes little progress towards achieving the requirements of the CVPIA.
- Eliminate Program Activities: a description of the impact to agency and stakeholder operations in the absence of the program.

For each option, the TM will describe:

- Funding Sources and Levels: typical authorities and budget levels under the proposed option.
- Services provided and Obligations Met: activities under the option and the related legal requirements and institutional goals.
- Unmet Obligations, Needs, and Adverse Effects: activities that would not occur and the potential legal and institutional consequences to other operations.
- Potential Mitigating Measures: actions outside of the CVPIA or agencies that can lessen adverse effects of the option, improve the ability to meet the goals and objectives of the component, or increase efficiencies of the component under resource limitations.
- Reimbursement Requirements: effects on water and power rates including the potential to trigger ability to pay relief.

Program component options will be requested from Program Managers in coordination with their counterparts at other agencies and with stakeholders. Program Manager will determine the level of coordination. The CVPIA Administrators will coordinate with Program Managers in review and edits. Descriptions of each option should generally provide a level of detail similar to the descriptions in the CPAR. Subsequent steps and feedback from the Project Team may request additional information. Interim levels of funding and performance will be developed within subsequent technical memorandum and should not be included at this time.

## Strategy Themes

The purpose of the Strategy Themes Technical Memorandum is to provide an opportunity to consider different aspects of the CVPIA in isolation without the need to provide consider a comprehensive approach that balances multiple components of the CVPIA. By definition, themes will neglect aspects of the CVPIA and do not provide a workable approach. Themes provide moldable building blocks for

1 reformulating an approach to CVPIA expenditures. Portions of the information developed by the  
2 themes will be incorporated and modified in subsequent steps.

3 Themes should be focused as narrowly as possible to achieve a single goal or multiple goals where  
4 overlap may occur with one or more components of the CVPIA. Each theme would include:

- 5 • Title: short keyword identifier,
- 6 • Purpose: CVPIA related objective of the theme,
- 7 • Methods: proposed actions to consider in achieving the theme,
- 8 • Performance and Financial Effects: expected range of outcomes and potential costs.
- 9 • Discussion: limitations and other aspects to consider within the theme.
- 10 • Program(s): provisions and projects addressed,

11 Themes should draw from the information in the Program Component Options TM. An example use of  
12 themes would be:

13 *Title: Conveyance Partnerships*

14 *Purpose: convey refuge water supplies to South of Delta refuges and acquire*  
15 *Incremental Level 4 water supplies.*

16 *Methods: partnerships to exchange and acquire water with districts that have*  
17 *diverse supplies proximate to CVPIA refuges.*

18 *Performance and Financial Effects: Incremental Level 4 water supplies would*  
19 *be exercised on options as part of a conveyance program. Financing would*  
20 *vary from year to year. Conveyance of Level 2 at \$30/AF costs approximately*  
21 *\$10 million per year. At \$200/AF, full incremental level 4 supplies could use up*  
22 *to \$26 million per year.*

23 *Discussion: The full quantities of level 2 water may not be available at*  
24 *allocations on a pattern and at a level of quality suitable for use by refuges.*  
25 *Partial implementation is a more likely scenario for some supplies on some*  
26 *schedules, and in some years.*

27 *Programs: Refuge Conveyance, Refuge Water Acquisition*

28 Themes are not intended to provide a complete project description nor address all concerns. Themes  
29 do not require thorough development and will be limited in detail given the limited timeframe. Themes  
30 should cover the highlights and identify the major steps.

31 Development will occur through a brainstorming process spanning one or more conference calls and or  
32 workshops. Project Team participants may be requested to develop individual themes.

### 33 Finance Plan Initial Alternatives

34 The purpose of the Finance Plan Initial Alternatives TM will consider each of the program component  
35 options and will combine revenue options and strategy themes into a potential finance plan. Initial  
36 alternatives may not address all issues and may not provide workable solutions for all (or any)  
37 participants, but serve as a means to identify complete funding and program activities. Initial  
38 alternatives should include:

- 1 • Revenue Option: option from the Revenue Options TM.
- 2 • Description of Approach: highlights on the approach driving the formulation of the initial
- 3 alternative.
- 4 • CVPIA Structure including, for each Program:
  - 5 ○ Funding Level: revenues from the Restoration Fund,
  - 6 ○ Key Strategies and Mitigation Measures: alternative approaches and funding sources,
  - 7 ○ Anticipated Accomplishments: potential CPAR and other objectives,
  - 8 ○ Unmet Needs: activities that will not occur as a result of the funding and approach.
- 9 • Effects on Water and Power Rates: activities currently covered by the CVPIA that would now
- 10 burden a different funding source.
- 11 • Advantages: reasons to select the alternative.

12 Members of the project team will be asked to develop alternatives with support from Reclamation and  
13 Service staff. Initial alternatives provide an opportunity to develop ideas for comprehensive strategies.  
14 Development of initial alternatives will attempt to make compromises and modifications to make  
15 different strategies work at some level even if the end product is not entirely desirable. The evaluation  
16 of an alternative is phrased strictly in terms of advantages to encourage participants to support a course  
17 of action and generate counter-proposals rather than creating opposition.

#### 18 **Decision Support Document**

19 The purpose of the Decision Support Document is to develop finance plan alternatives that highlight  
20 different approaches for implementing the CVPIA and the associated advantages and disadvantages.  
21 The Decision Support Document will select and potentially modify initial alternatives that Reclamation  
22 and the Service can support along with at least one stakeholder constituency (water, power, fishing,  
23 environment, others?). Reclamation and the Service will consult with our partner agencies, NMFS, DWR,  
24 and DFW to make a recommendation on a single alternative. Reclamation will solicit formal comments  
25 from the Project Team and provide a briefing to Reclamation and Service management in coordination  
26 with the Project Team.

#### 27 **Guidance Memorandum**

28 The guidance memorandum will document the decision by Reclamation and Service management.

#### 29 **Milestones and Schedule**

30 Milestones describe specific deliverables and baseline dates for tracking the progress of the Project.  
31 Table 1 shows the main deliverables for the project, intermediate products, and the anticipated  
32 schedule. A January 2015 deliverable would provide for incorporation of new language into the 2017  
33 appropriations. Attachment B provides interim steps to the nearest week and the proposed overlap of  
34 efforts where possible.

35 **Table 1. Deliverables and Completion Dates**

Milestone	Completion
Historical Practices TM	June 2014
Revenue Options TM	June 2014

Program Component Options TM	June 2014
Strategy Themes TM	August 2014
Finance Plan Initial Alternatives TM	October 2014
<b>Decision Support Document</b>	<b>January 2015</b>
Guidance Memorandum	--

1

2 Reclamation will update the schedule as the project moves forward and communicate the reasons for  
3 the differences to management and stakeholders.

#### 4 **Resources**

5 Resources describe the anticipated baseline need for staffing from Reclamation divisions to accomplish  
6 the Project. No additional refinement beyond the Charter is considered necessary at this time.

#### 7 **Coordination**

8 Reclamation will coordinate execution of this Project between agencies and stakeholders and maintain a  
9 list of contacts as a Project Team. Agencies and stakeholders will identify members for the Project Team  
10 and provide Reclamation with updates to the list of contacts as necessary. Members on the Project  
11 Team will be self-identified as either participants or observers. Observers will receive all emails.  
12 Participants are expected to make a commitment to taking an active role in coordinating with their  
13 respective organizations, responding to scheduling requests, making themselves available to meet the  
14 schedule, and reviewing materials.

15 Materials will be provided to the Team for comment prior to review and approval by Reclamation and  
16 Service management. Reclamation will request comments on materials prior to workshops so that  
17 discussions can focus on issue resolution. The Project Team will consider materials and comments as  
18 drafts for discussion unless explicitly identified otherwise.

19 Communication will occur primarily through email and the exchange of written materials with in-person  
20 workshops and conference calls to discuss and resolve potential issues. Reclamation will attempt to  
21 solicit available dates for workshops at a time when participant representatives from all interested  
22 parties can attend. Participants are encouraged to call and discuss materials one-on-one and in small  
23 groups during the development of materials and between workshops so as to maximize the productivity  
24 of in-person time.

25 Reclamation will establish a regular weekly call for no longer than one hour to provide status updates,  
26 discuss issues, and provide opportunities to develop materials for those not able to participate in  
27 workshops.

#### 28 **Roles and Responsibilities**

29 Roles and responsibilities describe the individuals and agencies involved and the expected participation.  
30 The PMP is not a binding document, but rather serves as a coordination tool for discussion.

#### 31 **Project Manager**

32 The Project Manager is authorized and responsible for managing the Project to successful completion as  
33 described in the charter.

## 1 Reclamation and the Service

2 Reclamation and the Service will provide staff expertise to develop documents and provide information  
3 to the project team on the CVPIA. Program Managers from Reclamation and the Service may  
4 communicate with their program-specific stakeholders and will assist the project manager in  
5 disseminating information and soliciting feedback.

## 6 Western Area Power Administration

7 Western Area Power Administration will provide staff to develop documents and provide information on  
8 power rates.

## 9 Other Participants

10 Other federal agencies, state agencies, water customers, power customers, and non-governmental  
11 organizations will assist in providing information and may author portions of documents.

## 12 Participants

13 Attachment A shows a list of participants in this Project. Participant roles identify the individuals  
14 developing materials, actively participating in conference calls or workshops, and reviewing draft  
15 documents as leads for their agency or organization. Observers describe individuals who will receive all  
16 communication, but a lack of response or availability will not control the schedule. Other roles identify  
17 individuals with specific work products under this PMP.

## 18 Project Review and Approvals

19 The delegation of authority for the CVPIA places Reclamation in the decision making role for the finance  
20 plan and directs coordination with the Service. The Reclamation CVPIA Administrator is responsible for  
21 coordinating information and decisions within Reclamation. The Service CVPIA Administrator is  
22 responsible for coordinating information and decisions within the Service. Project Team representatives  
23 are responsible for communicating concerns through their respective organizations.

24 Reclamation will provide draft documents and preliminary information to the Project Team as draft  
25 materials for discussion prior to management approval and prior to legal review. Documents may  
26 change upon management and/or legal review. The Project Manager will endeavor to identify areas  
27 with a high potential for changes and seek preliminary management and legal guidance as appropriate,  
28 as determined by the Project Manager, throughout the course of the project. Comments and edits to  
29 deliverables from the Project Team will be treated as informal information for discussion purposes  
30 unless otherwise identified. Reclamation will, at minimum, request formal comments on the Decision  
31 Support Memorandum so as to provide opportunities for participating agencies and stakeholders to  
32 formally document concerns and requests.

## 33 Risk Management

34 Risk management identifies the major factors that may prevent or impeded the successful  
35 accomplishment of the goals and objectives of this Project and the measures to reduce or accommodate  
36 potential impacts. The PM will work with the Project Team on risk avoidance and mitigation measures.  
37 Reclamation will prepare and maintain a project schedule that identifies deliverables and coordination  
38 points. In the event that any affected party anticipates an inability to meet the schedule, that party will  
39 notify the group and propose adjustments to the assignment of work, methods, or schedule.

1 Reclamation believes that all parties have a vested interest in reaching workable solutions together and  
2 that no party stands to gain from withholding participation; therefore, risk management is a shared task  
3 coordinated by the Project Manager. The following sections describe risks and the associated mitigation  
4 and avoidance:

#### 5 Perception of Progress

6 The project proponent, NCPA, raised this issue several years ago and is looking for rapid action that does  
7 not provide much time for development and coordination. The project proponent lacks confidence that  
8 this process will lead to a decision.

9 Reclamation will implement project management to identify interim milestones and the schedule shown  
10 in Attachment B. Anticipated delays in meeting the milestones will be identified and discussed as a  
11 project team in regular coordination conference calls. Upon increasing delays on two or more technical  
12 memorandum, the Project Manager will consult with the Project Team and seek guidance from  
13 Reclamation and Service management to identify alternative approaches or additional resources.

#### 14 Conflicting Objectives

15 Some of the goals and objectives conflict, e.g. reduced collections and completion of CVPIA activities.

16 The Project Team will identify where the goals and objectives of this project conflict and provide  
17 suggestions on reasonable compromises via the technical process. Proponents for specific conflicting  
18 goals will be asked to swap roles and propose measures that accomplish the opposing goals in a manner  
19 that minimizes impacts to his or her advocacy position.

#### 20 Non-Negotiable Points

21 Identification of areas where agencies or stakeholders are unable or unwilling to entertain potential  
22 compromises.

23 The technical process is designed for modular development where agencies and stakeholders can  
24 develop positions relatively independent of each other and without the requirement to come to  
25 agreement. In the Decision Support Document, participants will be encouraged to dialog about how to  
26 move as close as possible so as to minimize their potential risks in a Reclamation and Service  
27 management decision, but may maintain independent preferred alternatives.

#### 28 Legal Interpretations

29 Disagreement on administrative authorities and the meanings of different provisions within the CVPIA  
30 or other legislation.

31 The technical process is designed for modular develop such that entities may formulate positions  
32 independent of each other. The Project Team will not seek a consensus on legal interpretations unless  
33 agreed to as necessary by all parties. Individual participants may independently seek advice on their  
34 own initiative and propose specific legal approaches as part of different options, themes, or alternatives.

#### 35 Irreconcilable Issues

36 Policy decisions that cannot be resolved within the Project Team.

37 The technical process is designed for modular development. Issues that cannot be resolved or that  
38 prevent progress will be tabled to the extent practicable and participants will seek management

1 intervention. The Project Manager will request senior management to contact counterparts within  
2 agencies and organizations to provide direction with an emphasis on means to table the issues.

### 3 *Stakeholder Participation*

4 Ability to obtain involvement by effected parties in the development of the Project deliverables.

5 Reclamation and Service Program Managers should contact Program-specific stakeholders to inform and  
6 invite participation in the process as either a participant or an observer.

### 7 *Time and Stakeholder Availability*

8 Ability to find time to check-in, schedule workshops, and provide for dialog on issues and ideas.

9 Reclamation will seek to identify workshops at times whereby a broad group can participate.

10 Participating organization will be requested to designate a primary and a backup contact. Participants  
11 will indicate one of three options:

- 12 1. Available
- 13 2. Not Available, but Alternative Representatives can Attend
- 14 3. Not Available and Resolution Requested

15 Reclamation will contact parties requesting resolution of schedule conflicts. In the event that all parties  
16 cannot attend, Reclamation will select a time where the majority can participate and may schedule a  
17 second meeting where the remainder can participate.

18 Reclamation will host regular status calls so that Project Team members can catch up and dialog on  
19 subjects where they were not able to attend.

## 20 **Data Management**

21 Data management describes how the information supporting this project will be managed and stored.

22 Project files will be retained on the Reclamation CVPIA network drive as a project under the title *Finance*  
23 *Plan* following the established folder structure and naming conventions. Completion of this project will  
24 result in a document under *Administration\Guidance\Finance Plan* and the project folder will be date  
25 stamped in the folder name and moved to the archive. Interim products will be deleted. Supporting  
26 data, analysis, comments, edits, and meeting materials will be retained along with other files relevant to  
27 the decision.

28 The Project Manager will make select files available, for the duration of this Project, using the Google  
29 drive feature of Bison Connect and provide access to all Reclamation and Service participants on the  
30 Project Team. Department of the Interior policies do not allow for access by external participants.

31 Stakeholders may receive a copy of the folder, except for solicitor and privileged communications, upon  
32 completion of the project. Stakeholders will be transmitted interim materials on an as needed basis as  
33 determined by Reclamation or upon request.

## 34 **Change Management**

35 Changes to this PMP will be documented via errata and update pages that identify the specific sections  
36 of the PMP and the modified language via tracked changes. The PMP will then be updated, versioning  
37 incremented, and the modification to the original appended as necessary as determined by  
38 Reclamation.

1 **Close-Out**

2 Reclamation will solicit feedback from the Project Team and management to prepare a close-out report  
3 documenting successes and lessons learned for the purpose of improving project management and the  
4 coordination of the project teams. The close-out report shall contain a description of:

- 5 1. Project Successes: aspects and elements of the project that went well and should be preserved  
6 or enhanced for future efforts.
- 7 2. Potential Improvements: specific suggestions and recommendations in hindsight for aspects  
8 and elements that would have made this specific project go better.
- 9 3. Baseline Consistency: differences between the baseline estimates for schedule and the actual  
10 completion dates. Budget comparisons are not anticipated to have meaning based on the  
11 extent of prior work.

12 The technical process section of this PMP describes the specific factors. Reclamation will attempt to  
13 request an individual without direct involvement in the execution of this Project to facilitate close-out.

14 **Project Management Plan Approval**

15 The signatures below relay understanding and agreement with the purpose and content of this Project  
16 Management Plan and the resources committed to accomplishment of this Project.

17 \_\_\_\_\_ Date  
18 Richard Woodley  
Chief, Resources Division

19 \_\_\_\_\_ Date  
20 Autumn Wolfe  
Acting Chief, Financial Management Division

21 \_\_\_\_\_ Date  
22 Ann Lubas-Williams  
Manager, Program Coordination Office