

Agenda Number 10.

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MEETING DATE: January 5, 2017

AGENDA ITEM: Review of and Update on Lower Basin Drought Contingency Plan (LBDCP) and Drought Contingency Plan (DCP) Plus Plan

LINKAGE TO STRATEGIC PLAN, POLICY, STATUTE OR GUIDING PRINCIPLE:

- Optimize reliability and sustainability of CAP water supply
- Reduce risk associated with CAP's junior priority
- Manage risk and opportunities posed by climate change

PREVIOUS BOARD ACTION/ACTIVITY:

April 7, 2016 – Update on LBDCP – Executive session (e-session)

May 5, 2016 – Update on LBDCP – open session

June 9, 2016 – Update on LBDCP – open session and e-session

July 25 and 26 – Stakeholder Meetings with CAP Tribal, M&I and Agriculture LBDCP

August 4, 2016 – Update on LBDCP - open session and e-session

September 1, 2016 - Update on LBDCP - open session and e-session

October 6, 2016 – Update on LBDCP - open session and e-session

November 3, 2016 - Update on LBDCP - open session and e-session

December 1, 2016 - Update on LBDCP - open session and e-session

ISSUE SUMMARY/DESCRIPTION:***LOWER BASIN DROUGHT CONTINGENCY PLAN***Background and Summary

In 2007, the seven Colorado River Basin States (Basin States) reached an agreement on coordinated reservoir operation and shortage sharing and the Secretary of the Interior adopted the Record of Decision to implement the Colorado River Interim Guidelines (Interim Guidelines). The Interim Guidelines are in effect through 2026. In addition to rules for conjunctive management of Lakes Powell and Mead, the Interim Guidelines provide for voluntary reductions in deliveries to water users in Arizona and Nevada when the water levels in Lake Mead fall below specified trigger elevations (elevations 1075', 1050' and 1025'). California was not included in these shortage reductions. The Interim Guidelines provide if Lake Mead were to drop below elevation 1025', the Secretary of the Interior would consult with the Basin States to discuss what additional actions or reductions would be necessary to prevent Lake Mead from

falling below elevation 1,000'. However, the Interim Guidelines do not define how the additional reductions necessary to protect elevation 1,000' would be quantified or shared among the Lower Basin States. Hydrologic modeling conducted by Reclamation in 2007 projected about a 10 percent chance of Lake Mead falling to elevation 1020' through 2026.

In 2015, Reclamation conducted an updated hydrologic study, which focused on the most recent 25 years of observed hydrology in the Colorado River Basin. This updated hydrologic modeling determined that the risk of Lake Mead reaching elevation 1020' by 2026 had increased to about 25 percent (from a 10 percent probability projected in 2007). At critically low reservoir elevations, there is a risk that Arizona, and CAP in particular, will be required to take catastrophically deep reductions, Las Vegas' water supply is threatened and, potentially, supplies to Southern California cities could be cut. In response to Reclamation's updated study, principals from Arizona, Nevada and California (the Lower Basin States) and the United States focused on developing a plan to reduce the risk of Lake Mead falling to elevation 1020' to about the same probability that was anticipated when the Interim Guidelines were adopted in 2007. The negotiations resulted in the development of the draft Lower Basin Drought Contingency Plan (LBDCP).

The LBDCP would be in place through the year 2026, when the Interim Guidelines expire. It has three main components. The first, and most significant component, is an agreement by Arizona and Nevada to take additional water use reductions, above those already contemplated in the Interim Guidelines and at higher elevations, and an agreement by California to take water use reductions. Additionally, the United States agrees to conserve 100,000 acre-feet of Colorado River water per year for storage in Lake Mead. The attached table, Attachment 1, shows the proposed LBDCP reductions to Arizona, Nevada, California and the United States, together with the shortage reductions that currently apply to Arizona and Nevada under the Interim Guidelines. This component of the LBDCP, including detailed analysis of the impacts of proposed LBDCP reductions for Arizona on CAP water users, has been the subject of multiple open session Board briefings, CAWCD stakeholder meetings and joint ADWR/CAWCD public workshops since mid- 2016. Another critical element of this first component is an agreement by the Lower Basin States and the United States to absolutely protect Lake Mead from falling below elevation 1020'. Specifically, whenever any August 24-month study projects the elevation of Lake Mead to be below 1030' in the subsequent two years, the parties agree to consult to determine what additional measures are required to protect Lake Mead from falling below elevation 1020'.

The second component of the LBDCP creates greater flexibility in the rules governing the Intentionally Created Surplus Program, a program created under the Interim Guidelines. This component is more fully discussed below. The third component addresses how the LBDCP water use reductions are accounted for as storage in Lake Mead, and the conditions for later recovery of these storage amounts. This component is also more fully discussed below.

Intentionally Created Surplus and the LBDCP

The Interim Guidelines established the Intentionally Created Surplus (ICS) Program,

which allows Arizona, Nevada and California to store intentionally unused Colorado River water in Lake Mead (as ICS credits) for later delivery. The ICS Program encourages conservation of existing consumptive uses of Colorado River water, with the conservation providing an immediate benefit to Lake Mead elevations, and a future water supply benefit to the Lower Basin contractor that creates the ICS credit. The Interim Guidelines define five categories of ICS, by type of conservation activity. The Guidelines also impose conditions on who is eligible to create ICS (entities holding entitlements to mainstream water), annual limits on how many ICS credits may be created by each Lower Basin State, total ICS accumulation limits for each Lower Basin State, evaporative losses assessed to ICS, and limitations on when ICS can be recovered (delivered out of Lake Mead), which are expressed in relation to Lake Mead elevation. Attachment 2, "ICS Primer", is a one page document summarizing the main elements of the ICS Program created by the Interim Guidelines.

In negotiating the LBDCP, California desired increased flexibility in the conditions governing creation, evaporation and delivery of ICS, in exchange for its agreement to share LBDCP reductions, while Arizona sought to provide incentives for California to create additional ICS, i.e. California storing more water in Lake Mead. Specifically, under the Interim Guidelines, ICS credits cannot be recovered, i.e., taken back out of Lake Mead, when Lake Mead is below elevation 1075'. The LBDCP authorizes the recovery of ICS credits at lower Lake Mead elevations; ICS credits may be recovered above elevation 1045' and, under certain conditions, ICS credits may be recovered above elevation 1025'. However, ICS credits cannot be recovered below elevation 1025'.

A Lower Basin State may use its available ICS credits to offset a LBDCP water use reduction. For example, if Arizona (CAP) were required under the LBDCP to reduce its water use in a given year by 192,000 acre-feet, it could apply available ICS credits in its ICS account to offset this obligation.

Additionally, under the Interim Guidelines, ICS credits suffer a 3% evaporative loss each year they remain in storage in Lake Mead. The LBDCP provides that existing Extraordinary Conservation ICS will not be assessed any additional evaporation losses after December 31, 2016. Further, to the extent that Extraordinary Conservation ICS is created during 2017 through 2026, evaporative losses are limited to the following: 5% the initial year of creation, 3% the year following creation and 2% the second year following creation.

The Interim Guidelines impose a maximum limit on the quantity of ICS credits that may be accumulated in each Lower Basin State's ICS account at any time. Those maximum accumulation limits are as follows: Arizona contractors – 300,000 acre-feet; Nevada contractors – 300,000 acre-feet; and California contractors – 1.5 million acre-feet. The LBDCP increases each Lower Basin State's maximum ICS accumulation limit by 200,000 acre-feet, so the new proposed limits are as follows: Arizona contractors – 500,000 acre-feet; Nevada contractors – 500,000 acre-feet; and California contractors – 1.7 million acre-feet.

Finally, the Interim Guidelines impose an annual limit on the quantity of ICS credits that each Lower Basin State may create in a single year. The LBDCP authorizes Lower Basin states to use available annual ICS creation capacity from another state if permission is given. For example, under the Interim Guidelines, Arizona's annual ICS creation limit is 100,000 acre-feet. If Arizona desired in a given year to create 125,000 acre-feet of ICS credits, and Nevada was not using its full annual ICS creation capacity, Arizona could seek consent to use some of Nevada's ICS creation capacity thereby enabling Arizona to accrue 125,000 acre-feet of ICS in that year.

Accounting for and Recovery of LBDCP Reductions

The third component of the LBDCP addresses how the LBDCP water use reductions are accounted for as storage in Lake Mead, and the conditions for later recovery of these storage amounts. As outlined above, the LBDCP provides for water use reductions by each Lower Basin State at certain trigger elevations, see Attachment 1. All LBDCP water reductions that meet the rigorous test for qualification as Extraordinary ICS (i.e., demonstrated reduction in existing beneficial consumptive use) will be accounted for as Drought Contingency Plan ICS (DCP-ICS). As such, LBDCP reductions qualifying as DCP-ICS will be available for delivery (to be taken back out of Lake Mead) in the future (through 2057), if and when Lake Mead elevations recover to 1,110'. Additionally, during the period 2027-2057, DCP-ICS may be recovered above Lake Mead elevation 1075' with a 20% cut for the benefit of the Lake, or the recovered DCP-ICS must be returned within five years.

The LBDCP further allows a Lower Basin State to temporarily access (borrow) some of its accrued DCP-ICS at elevations below 1075'. Specifically, at any time through 2057, when Lake Mead is above elevation 1025', DCP-ICS may be borrowed, with an absolute obligation to return the water by the end of the following year.

Status of LBDCP

While the terms of the first major component of the LBDCP have been settled for some time now, the Lower Basin States and the United States have continued to work on various implementation details relating to the second and third components of the LBDCP. For most of 2016, the emphasis has been on developing implementation plans within each state (including the "DCP Plus" within Arizona) and working with the Upper Basin States to get them comfortable with the Lower Basin Plan, since their support for this plan will be needed when Congressional approval is sought.

The LBDCP is built as an "overlay" to the Interim Guidelines. However, certain provisions of the Interim Guidelines are modified by the LBDCP. Since the Upper Basin States were all parties to the Interim Guidelines, they have concerns about some of the modifications, and have sought assurances that Lake Powell and the Upper Basin will not be harmed by the LBDCP. The Lower Basin States and Reclamation have provided a significant amount of modelling to alleviate these concerns, and even more modelling is being undertaken. At this point, the Upper Basin States seem to accept that the LBDCP is a good thing that will strengthen the Colorado River system significantly, but they continue to struggle with their perception of a need to include explicit "hold harmless" language in the LBDCP.

At CRWUA, the Lower Basin and Upper Basin representatives agreed to devote their next all-day joint meeting on January 3, 2017, to reviewing and modifying the LBDCP

draft agreement to give them adequate comfort. If possible, work will occur on these discussions prior to January 3, 2017.

The Upper Basin has its own DCP, which they have stated clearly that they expect the Lower Basin States and their Congressional delegations to support. The Upper Basin DCP is much simpler than the Lower Basin DCP and is mostly the expansion of programs that already exist and are well understood.

During the first week of December, draft language authorizing the Secretary of the Interior to implement the LBDCP was being circulated for Congressional approval during the lame duck session for approval of both Upper Basin and Lower Basin DCP programs. However, Congress adjourned before consensus could be reached among the various Basin States and their Congressional delegations on language and how to proceed. So, this will have to wait until the new Congress.

California has made significant progress on its individual intra-State implementation plan, and is ready, at least logistically, to take its plans to the governing boards of the California contractors. There are a number of implementing agreements between MWD and the other major Colorado River Contractors that need to be approved. The biggest impediment to further progress in California is MWD's desire for more certainty on the Bay-Delta Project and IID's desire for more certainty regarding the Salton Sea.

Arizona is still working on developing its intra-State implementation plan, now known as DCP Plus, the terms of which are outlined below.

ARIZONA IMPLEMENTATION PLAN – DCP PLUS

The Arizona Department of Water Resources (ADWR) has been leading the effort to achieve consensus among various Arizona entities to support the state legislation that will be required to implement the LBDCP. Specifically, the Arizona legislature will need to authorize the State of Arizona to execute a forbearance agreement, which will be a subsidiary agreement to the LBDCP agreement. That effort has included representatives from the following entities: ADWR, CAWCD, AMWUA, Gila River Indian Community, Tohono O'odham Nation, Cities of Phoenix and Tucson, SAWUA, Yuma agricultural districts, private water utilities, Mohave County Water Authority, Salt River Project and Reclamation.

The Arizona Implementation Plan has settled on a construct that conserves even more water in Lake Mead than is required under the LBDCP. As such, it has become known as "DCP Plus".

The overarching goal of DCP Plus is to leave sufficient water in Lake Mead during the next three years (2017-2019) to drastically improve the probability of keeping the lake above elevation 1075' through 2020, thus avoiding a Tier 1 shortage under the Interim Guidelines, and averting significant cuts to the CAP agricultural pool.

The total quantity of conservation contemplated by DCP Plus is 1.234 million acre-feet, approximately 400,000 acre-feet per year, which is more than twice as much as what would be required under LBDCP for Arizona in the elevation 1075'-1090' tier (192,000 acre-feet per year). This conservation would be accomplished through three mechanisms:

- 1) "Uncompensated System Conservation" – this is the conservation mandated for Arizona by LBDCP for the 1075'-1090' tier that will be taken by CAP without compensation: 192,000 acre-feet per year. This contribution would become effective in 2018, the anticipated first year that LBDCP would be in effect after all the required approvals. In 2017, CAP would commit to conserve 185,000 acre-feet on a voluntary basis, about the same amount that was voluntarily contributed in 2015 and 2016 under the MOU and Pilot System Conservation programs, e.g. Ag Forbearance and other initiatives. System conservation water is not recoverable, it just remains in the lake. Total 2017-2019 quantity 569,000 acre-feet.
- 2) "Compensated System Conservation" – this is system conservation that would be voluntarily contributed by certain CAP Tribes, including GRIC, CAP Non-Indian Ag and possibly other CAP subcontractors. The exact quantities and details are yet to be worked out, but the totals being contemplated are 410,000 acre-feet over three years 2017-2019. The compensation sought is \$150/acre-foot for a total price tag of \$61.5 million over the three years. While the bulk of this funding is expected to come from the federal government, no specific authorization for DCP Plus has been made. It is possible that some of the \$50 million authorized for an extension of the Pilot System Conservation Program by Congress in the bill passed two weeks ago (S.612) could be available, but that is not certain. Other sources of funding could include Reclamation from its own annual budget (which is only funded through April 2017 under a continuing resolution), the State of Arizona, certain cities, NGOs, etc. ADWR is actively seeking funding sponsors. System Conservation water must demonstrate actual reduction in use, and does not include "unused contract apportionment," otherwise known as "CAP excess" that is the CAP Board's responsibility to administer.
- 3) "Intentionally Created Surplus" – Arizona tribes, including GRIC and potentially other tribes, anticipate creating a total of 455,000 acre-feet of ICS over the three years (2017-2019), through a verified reduction in existing beneficial use of a tribal CAP entitlement or an On-River tribal entitlement. No compensation is received, but the creators of ICS will receive a credit for each acre-foot conserved that can be recovered later under certain conditions. In order to be able to create ICS, a specific "qualifying activity" must be completed. Under the 2007 Guidelines, these "qualifying activities" must be vetted and approved by the Lower Basin States Principals. The rules governing creation and recovery of ICS are quite specific. CAP tribal ICS would be created with the cooperation of CAWCD. The City of Phoenix, and potentially other parties, are negotiating with GRIC to acquire some of the CAP tribal ICS that GRIC plans to create.

These additional reductions will result in additional increases in CAP Fixed OM&R prices in the near term. However, it is anticipated that the short-term increases (2017-2019) will be offset by lower prices that would otherwise occur in 2020-2022 by the beneficial effect of DCP Plus of pushing out potential Tier 1 and Tier 2 shortages by 2-3 years. Attachment 3 is a CAP Water Rate Sensitivity Analysis showing the impacts on CAP rates from DCP and DCP Plus.

It is anticipated that the provisions of DCP Plus will be spelled out in a “Memorandum of Agreement” or similar document among the parties, including CAWCD. There could be other side agreements among subsets of the parties, for example, an agreement on ICS or an agreement on CAP Non-Indian Ag.

The biggest issue by far is the availability of funding. Even if all the other details of DCP Plus are worked out, it is uncertain whether the deal will come together if there is not some relative certainty that three years of funding will be available. Many of the activities to create System Conservation or ICS are difficult, and are not practical to pursue a bit at a time.

Another recent issue that has arisen is a desire by some parties to DCP Plus for CAWCD to commit to leave “all CAP excess water” in Lake Mead in addition to the 569,000 acre-feet of uncompensated system conservation in 2017-2019. “CAP excess water” is all Project Water that is unused by CAP contractors or sub-contractors (M&I, Indian and allocated NIA priority water). CAP holds an unquantified contract right to Colorado River water; Project water includes an annual apportionment of 1.5 million acre-feet of water for the CAP, plus any unused Colorado River water of higher or co-equal priority Arizona On-River contractors. Every year the volume of CAP excess water varies, and is a function of both the extent to which CAP subcontractors and contractors fully schedule and utilize their entitlements and the extent to which On-River users of co-equal or higher priority fully utilize their entitlements. CAP excess water is what comprises the CAP Ag Pool and the CAP Statutory Firming Pool (CAGR, AWBA and Reclamation) under the CAP “Access to Excess” Policy, and also where the Uncompensated System Conservation water for DCP Plus is coming from.

Because the orders for 2017 are final, we are relatively confident that CAP will be able to conserve the 185,000 acre-feet committed for 2017. However, it will be a challenge in 2018 and 2019 to conserve the 192,000 acre-feet per year under DCP, although these reductions will be mandatory. Consequently, what will be reduced first is the Statutory Firming Pool and, next, the Ag Pool, according to CAP priorities. At this point, based on the orders for 2017, we expect the Statutory Firming Pool to be wiped out and the Ag Pool to have to be reduced by 50-60KAF in 2018 and 2019 in order to meet the DCP reductions.

It does not make sense to staff to agree, in advance, to leave any CAP Excess Water that might be available in Lake Mead without first restoring the Ag Pool and next restoring the Statutory Firming Pool to at least the level available for 2017 (42,000 acre-feet) before considering whether to leave any additional available excess in Lake Mead.

Any other unequivocal commitment to leave an undefined quantity of water that may or may not actually be available leaves the Ag Pool exposed and cuts off CAGR, AWBA and Reclamation federal firming in advance. None of the other parties to DCP Plus, who are receiving compensation or ICS credits, are being asked to commit to an open-ended obligation to commit more water or money.

Process

Negotiations on the terms of DCP Plus continue.

SCHEDULED FOR BOARD ACTION:

The timing for completion of LBDCP and DCP Plus remain uncertain.

Attachments.

LBDCP Reductions

Lake Mead Elevation	AZ (2007)	AZ (Plan)	AZ Total	NV (2007)	NV (Plan)	NV Total	CA (2007)	CA (Plan)	CA Total	USBR	Mexico Minute 319*	Total
1,090-1,075	0	192,000	192,000	0	8,000	8,000	0	0	0	100,000	0	300,000
1,075-1,050	320,000	192,000	512,000	13,000	8,000	21,000	0	0	0	100,000	50,000	683,000
1,050-1,045	400,000	192,000	592,000	17,000	8,000	25,000	0	0	0	100,000	70,000	787,000
1,045-1,040	400,000	240,000	640,000	17,000	10,000	27,000	0	200,000	200,000	100,000	70,000	1,037,000
1,040-1,035	400,000	240,000	640,000	17,000	10,000	27,000	0	250,000	250,000	100,000	70,000	1,087,000
1,035-1,030	400,000	240,000	640,000	17,000	10,000	27,000	0	300,000	300,000	100,000	70,000	1,137,000
1,030-1,025	400,000	240,000	640,000	17,000	10,000	27,000	0	350,000	350,000	100,000	70,000	1,187,000
<1,025	480,000	240,000	720,000	20,000	10,000	30,000	0	350,000	350,000	100,000	125,000	1,325,000

*Minute 319 reductions extend through 2017. Assume reductions continue in Minute 32X.

Agenda Number 10. Attachment 2.

2007 Guidelines: Intentionally Created Surplus (ICS) – Key Points

- ICS is an accounting tool to encourage water conservation by Lower Basin contractors:
 - Goal 1 - Encourage conservation to leave water in Lake Mead to help avoid shortages,
 - Goal 2 - Generate a temporary water supply for later use when Lake Mead is healthier,
 - ICS is intended to come from active conservation of existing uses or new savings of losses
 - ICS requires the approval of the parties to the '07 Guidelines Forbearance Agreement (MWD, CVWD, IID, PVID, Needles, ADWR, SNWA, and CRCN) and BOR,
 - Project Description in the form of an Exhibit to the Forbearance Agreement,
 - Annual Creation and Verification Plan,
 - Delivery Agreement
 - Monitoring, verification, and reporting by BOR (Decree Accounting Report).
 - ICS is NOT intended for unused apportionment or water that was not being put to use,
 - Creates a future water supply – monitoring/verification more rigorous than PSCP.
 - Only 4 Contractors currently have ICS accounts
 - Arizona: CAWCD (due to CAP's unique contract)
 - Nevada: SNWA
 - California: MWD with small volume to IID
- ICS includes 5 types as well as conversion to Drought Shortage Supply:
 - Extraordinary Conservation ICS
 - Traditional conservation mechanisms such as fallowing and on-farm efficiency
 - Examples include MWD's PVID rotational fallowing program
 - Annual creation, release, and cumulative accounts for EC-ICS are as follows:
 - Arizona: 100 kaf/yr, 300 kaf/yr, 300 kaf,
 - California: 400 kaf/yr, 400 kaf/yr, 1,500 kaf,
 - Nevada: 125 kaf/yr, 300 kaf/yr, 300 kaf,
 - Evaporation losses assessed annually (5% on creation, 3% thereafter).
 - System Efficiency ICS
 - Investments to conserve losses and improve delivery efficiency for the system
 - Examples include Brock Reservoir and YDP Pilot Run
 - Tributary Conservation ICS
 - Purchase of Colorado River perfected rights prior to June 25, 1929 (BCPA)
 - Only used by SNWA to date
 - Imported ICS
 - Conveyance of non-Colorado River water in the contractors State
 - Only used by SNWA to date
 - Binational ICS (BICS) – created through Minute 319
 - Drought Shortage Supply
 - Means to convert Tributary or Imported ICS to a water supply to be released during shortage conditions – not technically ICS
- Existing balances (EOY 2015):
 - CAWCD 103,050 (system efficiency) + 217,750 af pending (BICS & EC-ICS) = 320, 800 af
 - MWD & IID = 97,791 af (80,405 system efficiency + 17,386 EC-ICS)
 - SNWA = 511,023 af (403,050 system efficiency + 84,083 EC-ICS + 23,890 Tributary)

**CAP Water Rate Sensitivity Analysis
DCP+ versus DCP Alone**

	2016	2017	2018	2019	2020	2021	2022
<u>Published Rates (\$/acre-foot)</u>							
Fixed OM&R	85	87	91	96	102	106	113
CAP Energy Rate	76	77	80	82	101	115	114
	161	164	171	178	203	221	227
<u>Fixed OM&R (\$/acre-foot)</u>							
Published Rates (DCP-like)	85	87	91	96	102	106	113
Lake Mead Elevation*	>1075	>1075	>1075	>1075	>1075	>1075	>1075
CAP Deliveries 000 acre-feet	1488	1534	1537	1459	1459	1461	1463
Probable with DCP Alone	85	87	91	123	131	146	156
Lake Mead Elevation*	>1075	>1075	>1075	Tier 1	Tier 1	Tier 2	Tier 2
CAP Deliveries 000 acre-feet	1488	1534	1537	1139	1139	1061	1063
Change from Published Rates	100%	100%	100%	128%	128%	138%	138%
Probable with DCP+	85	100	108	113	102	136	145
Lake Mead Elevation*	>1075	>1075	>1075	>1075	>1075	Tier 1	Tier 1
CAP Deliveries 000 acre-feet	1488	1334	1295	1237	1459	1141	1143
Change from Published Rates	100%	115%	119%	118%	100%	128%	128%
Change from DCP Alone	0%	15%	19%	-10%	-28%	-9%	-10%
Cumulative from DCP Alone	0%	7%	11%	6%	-1%	-2%	-3%

* January 1

Elevations do not consider creation of additional ICS by California

CAP Water Rate Sensitivity Analysis

DCP+ versus DCP Alone

	2016	2017	2018	2019	2020	2021	2022
<u>Water Delivery Rate (\$/a-f)</u>							
Published Rates (DCP-like)	161	164	171	178	203	221	227
Lake Mead Elevation*	>1075	>1075	>1075	>1075	>1075	>1075	>1075
CAP Deliveries 000 acre-feet	1488	1534	1537	1459	1459	1461	1463
Probable with DCP Alone	161	164	171	205	232	261	270
Lake Mead Elevation*	>1075	>1075	>1075	Tier 1	Tier 1	Tier 2	Tier 2
CAP Deliveries 000 acre-feet	1488	1534	1537	1139	1139	1061	1063
Change from Published Rates	100%	100%	100%	115%	114%	118%	119%
Probable with DCP+	161	177	188	195	203	251	259
Lake Mead Elevation*	>1075	>1075	>1075	>1075	>1075	Tier 1	Tier 1
CAP Deliveries 000 acre-feet	1488	1334	1295	1237	1459	1141	1143
Change from Published Rates	100%	108%	110%	110%	100%	114%	114%
Change from DCP Alone	0%	8%	10%	-6%	-14%	-5%	-5%
Cumulative from DCP Alone	0%	4%	6%	3%	0%	-1%	-2%

* January 1

Elevations do not consider creation of additional ICS by California