

Aug 04, 2026

DEPARTMENT OF
WATER RESOURCES

Sarah A. Klahn (ISB #7928)
 Maximilian C. Bricker (ISB #12283)
 SOMACH SIMMONS & DUNN, P.C.
 1155 Canyon St., Suite 110
 Boulder, CO 80302
sklahn@somachlaw.com
mbricker@somachlaw.com
Attorneys for City of Pocatello

Robert L. Harris (ISB #7018)
 HOLDEN KIDWELL HAHN & CRAPO,
 P.L.L.C.
 P.O. Box 50130
 Idaho Falls, ID 83405
rharris@holdenlegal.com
Attorney for City of Idaho Falls

Candice M. McHugh (ISB #5908)
 Chris M. Bromley (ISB #6530)
 MCHUGH BROMLEY, PLLC
 P.O. Box 107
 Boise ID 83701
cbromley@mchughbromley.com
cmchugh@mchughbromley.com
*Attorneys for the Cities of Bliss,
 Burley, Carey, Declo, Dietrich,
 Gooding, Hazelton, Heyburn, Jerome,
 Paul, Richfield, Rupert, Shoshone, and
 Wendell*

**BEFORE THE DEPARTMENT OF WATER RESOURCES
 OF THE STATE OF IDAHO**

IN THE MATTER OF DISTRIBUTION
 OF WATER TO VARIOUS WATER RIGHTS
 HELD BY OR FOR THE BENEFIT OF A&B
 IRRIGATION DISTRICT, AMERICAN
 FALLS RESERVOIR DISTRICT #2,
 BURLEY IRRIGATION DISTRICT, MILNER
 IRRIGATION DISTRICT, MINIDOKA
 IRRIGATION DISTRICT, NORTH SIDE
 CANAL COMPANY, AND TWIN FALLS
 CANAL COMPANY

Docket No. CM-DC-2010-001

**CITIES' PETITION FOR
 RECONSIDERATION OF ORDER
 REVISING APRIL 2026 FORECAST
 SUPPLY AND CONTINUING MAY 14,
 2026 CURTAILMENT ORDER
 (METHODOLOGY STEPS 5 & 6)**

COME NOW the City of Pocatello, City of Idaho Falls, and the Coalition of Cities¹
 (collectively, the "Cities"), by and through their respective undersigned counsel of record,
 pursuant to Idaho Code section 67-5246(4) and IDAPA 37.01.01.740.02.b., and hereby petition
 the Director to reconsider the *Order Revising April 2026 Forecast Supply and Continuing May
 14, 2026 Curtailment Order (Methodology Steps 5 & 6)* dated July 21, 2026 ("Steps 5-6 Order"),

¹ The Coalition of Cities is composed of the Cities of Bliss, Burley, Carey, Declo, Dietrich, Gooding, Hazelton, Heyburn, Jerome, Paul, Richfield, Rupert, Shoshone, and Wendell.

with respect to the April-June reasonable in-season demand (“RISD”) determinations and in-season demand shortfall (“IDS”) predictions for multiple members of the Surface Water Coalition (“SWC”). Specifically, the Cities request that the Director amend the *Steps 5-6 Order* by reducing the May RISD determinations—and, by extension, the IDS predictions—because they exceed the maximum volumes the SWC members can physically divert at their respective authorized points of diversion, or alternatively, have diverted historically. The Cities also request that the Director ensure RISD determinations in future as-applied Methodology Orders do not exceed such volumes. This action is necessary to ensure the Director’s RISD determinations and IDS predictions are factually and legally defensible.

In support of this petition, the Cities state as follows and include as Attachment 1 a technical memorandum prepared by the Cities’ consultant, Spronk Water Engineers (“SWE”).

BACKGROUND

The *Steps 5-6 Order* is a midseason order that updates the *Final Order Regarding April 2026 Forecast Supply (Methodology Steps 1-3)* (“*Steps 1-3 Order*”) dated April 16, 2026, by recalculating the RISD and revising the forecast supply (“FS”) for SWC members based on climatic and other conditions during the irrigation season to-date. *See Steps 5-6 Order* at 2. Together, the recalculated RISD and revised FS yield an updated IDS prediction. *See id.* at 8 (“[IDS] is calculated as the difference between RISD and the FS.”). These steps are set forth in the *Sixth Final Order Regarding Methodology for Determining Material Injury to Reasonable In-season Demand and Reasonable Carryover* dated July 19, 2023 (“*Sixth Methodology Order*”), and are implemented by the Director each year.

In 2026, the *Steps 5-6 Order* determined the SWC’s combined April-June RISD to be **1,907,342 acre-feet** (“AF”). *Steps 5-6 Order* at 6; *accord* Attach 1, Table 1. This includes a

determination that the SWC's combined RISD in the month of May was **995,818 AF**. *See* Attach. 1, Tables 2-3.² SWE compared the May 2026 RISD determinations for each SWC member with (1) the maximum volume each member can physically divert in a month based on their diversion capacities, and (2) the maximum volume each member has historically diverted in any month. *Id.* This analysis reveals that (1) for five of the seven SWC members, the May 2026 RISD determination is greater than they can possibly divert at their respective authorized points of diversion by a combined sum of approximately **201,200 AF**, and (2) for all seven SWC members, the May 2026 RISD determination is greater than they have ever diverted in any month by a combined sum of approximately **250,400 AF**. *Id.*

ARGUMENT

I. The Director Should Amend the *Steps 5-6 Order* Because the May RISD Determinations are Greater than the Volumes the SWC Members Can Physically Divert or Have Historically Diverted, Resulting in Erroneous IDS Predictions

The Director should amend the *Steps 5-6 Order* by reducing the April-June RISD determinations (on p. 6 of the order) so that the May RISD determinations embedded within do not exceed the maximum volumes the SWC members can physically divert at their respective authorized points of diversion, or alternatively, have ever historically diverted. Taking that action will necessarily entail also reducing the IDS predictions (on p. 8 of the order).

The Cities request this action to remedy existing RISD determinations and IDS predictions that are divorced from reality and place ground water users in a false light. The purpose of the Methodology, as indicated by the full name of the *Sixth Methodology Order*, is to determine the material injury—or shortfall—that SWC members endure as a result of junior

² This information is not contained on the face of the *Steps 5-6 Order* but is contained in the *July Background Information*. *See* Attach. 1 at 1 n.1.

ground water pumping. An over-simplified summary of the Methodology framework is (or should be): SWC members are materially injured in years where they are unable to divert surface water that they would have diverted but for the impacts caused by ground water pumping.

SWE's analysis demonstrates that the April-June RISD determinations disregard that framework. That is because the combined May RISD determinations of **995,818 AF** is **201,200 AF** greater than the SWC can *possibly* divert in a 31-day month and **250,400 AF** greater than the SWC has *ever* diverted in *any* month. *See* Attach. 1, Tables 2-3. In other words, even in the complete absence of historical ground water pumping, in May 2026, the SWC members would have diverted less than what the Director determined their combined RISD to be by a *substantial* amount. It is undisputed that the SWC never has, and physically cannot, divert the RISD volumes determined by the Director. Thus, the *Steps 5-6 Order* over-determines the SWC's combined April-June RISD and, by extension, over-predicts the SWC's combined IDS, in a manner that is unreasonable, indefensible, and inconsistent with the purpose of the Methodology.

A determination that a SWC member's RISD in a given month is greater than the volume that entity could have physically—or has ever historically—diverted lacks any rational basis and disregards undisputed facts, epitomizing arbitrary and capricious agency action. *See In re Delivery Call of A&B Irrigation Dist.*, 153 Idaho 500, 511 (2012) (“An action is capricious if it was done without a rational basis. It is arbitrary if it was done in disregard of the facts and circumstances presented or without adequate determining principles.”) (citations omitted). The Director must correct these errors in the *Steps 5-6 Order*.³

³ The Cities do not concede that correcting these errors would resolve all issues related to RISD determinations. The Cities do not address those other issues here and reserve such arguments.

II. The Director Should Prospectively Cap RISD Determinations Based on the Volumes the SWC Members Can Physically Divert or Have Historically Diverted

Looking beyond the *Steps 5-6 Order*, the Director should prospectively cap monthly RISD determinations at the maximum volumes the SWC members can physically divert at their respective authorized points of diversion, or alternatively, have historically diverted. It is a reasonable measure to take to avoid RISD determinations and IDS predictions that lack credibility because they ignore physical and empirical constraints.⁴ For example, the current combined IDS prediction suggests that ground water users are causing the SWC members to endure a shortage of **741,000 AF**, *see Steps 5-6 Order* at 8, when SWE's analysis shows that the number is excessive by roughly **200,000 AF** or more.⁵

There is no basis for the Director to make RISD determinations that exceed the maximum volumes the SWC members can divert or have ever diverted at their respective authorized points of diversion because the SWC members are simply not being shorted those incremental volumes—the SWC would not have diverted those volumes in May 2026 under *any* circumstance. Were the Director to continue making RISD determinations and IDS predictions that are overstated on that basis, and order ground water users to either mitigate or be curtailed,

⁴ Capping RISD determinations based on one or both of these constraints in the *Steps 5-6 Order* is consistent with the Department's use of *actual* diversion data to serve as the baseline RISD in the *Steps 1-3 Order* (i.e., the lack of any sideboards in the subsequent Methodology steps is what enables RISD determinations and IDS predictions to become untethered from reality). This concept is also well established in several other Department contexts. For example, when licensing water rights, the beneficial use examination rules specifically provide that the diversion rate and volume is capped by the Department to "the smaller of the permitted amount, the amount upon which the license examination fee is paid, **the capacity of the diversion works or the amount beneficially used prior to submitting proof of beneficial use**, including any statutory limitation of the duty of water." IDAPA 37.03.02.035.n. (emphasis added).

⁵ While the requested reduction in RISD determinations and IDS predictions may make little to no immediate impact insofar as it would not alter the existing curtailment date of October 31, 1900, it is important and imperative that the Director correct these errors before they recur in future as-applied Methodology Orders or are used against ground water users in another forum outside the SWC Delivery Call. Unduly excessive IDS predictions overstate the impacts of ground water pumping on the surface water supplies of the SWC, thereby placing ground water users in a false light. Moreover, the errors in the *Steps 5-6 Order* are not in isolation—there have been other excessive RISD determinations in recent years. *See Attach. 1 at 3.*

the result would either be (1) the SWC members receiving more water than they are entitled to under Idaho law, or (2) another surface water user(s) receiving a windfall. Imposing a cap on RISD determinations as described above is necessary to promote public confidence in the Department’s administration of the SWC Delivery Call and is consistent with the Director’s duty to use the “best available information and the best available science” to “continue to review and refine the process of predicting and evaluating material injury.” *Sixth Methodology Order* at 36-37 (Conclusion of Law ¶17).

CONCLUSION

It is undisputed the April-June RISD determinations are greater than the volumes the SWC members can physically divert or have historically diverted at their respective authorized points of diversion by *at least* **201,200 AF**. There is no basis for the Director to make IDS predictions and regulate ground water users based on such RISD determinations. Accordingly, the Cities respectfully request that the Director issue an amended *Steps 5-6 Order* that remedies those erroneous determinations/predictions, and, in future as-applied Methodology Orders, cap monthly RISD volumes based on the maximum volumes the SWC members can physically divert, or alternatively, have historically diverted.

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DATED this 4th day of August 2026.

SOMACH SIMMONS & DUNN, P.C.

By /s/ Maximilian C. Bricker
Sarah A. Klahn (ISB #7928)
Maximilian C. Bricker (ISB #12283)

Attorneys for City of Pocatello

MCHUGH BROMLEY, PLLC

By /s/ Candice M. McHugh
Candice M. McHugh (ISB# 5908)
Chris M. Bromley (ISB # 6530)

Attorneys for the Coalition of Cities

**HOLDEN KIDWELL HAHN & CRAPO
P.L.L.C.**

By /s/ Robert L. Harris
Robert L. Harris (ISB #7018)

Attorney for City of Idaho Falls

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 4th day of August 2026, the foregoing document was served via email to the following:

Director Mat Weaver
Garrick Baxter
Sarah Tschohl
DEPT. OF WATER RESOURCES
322 E Front St.
Boise, ID 83720-0098
Mat.weaver@idwr.idaho.gov
Garrick.baxter@idwr.idaho.gov
stschohl@idwr.idaho.gov
file@idwr.idaho.gov

John K. Simpson
IdaH20, PLLC
P.O. Box 152
Boise, ID 83701-0152
jks@idahowaters.com

Travis L. Thompson
Abigail Bitzenburg
PARSONS BEHLE & LATIMER
P.O. Box 63
Twin Falls, ID 83303-0063
tthompson@parsonsbehle.com
abitzenburg@parsonsbehle.com

Norman M. Semanko
Garrett M. Kitamura
PARSONS BEHLE & LATIMER
800 W Main St, Ste 1300
Boise, ID 83702
nsemanko@parsonsbehle.com
gkitamura@parsonsbehle.com

Matt Howard
US Bureau of Reclamation
1150 N Curtis Road
Boise, ID 83706-1234
mhoward@usbr.gov

Rich Diehl
City of Pocatello
P.O. Box 4169
Pocatello, ID 83205
rdiehl@pocatello.gov

Robert E. Williams
WILLIAMS, MESERVY, &
LOTHSPEICH, LLP
P.O. Box 168
Jerome, ID 83338
rewilliams@wmlattys.com

Zachary H. Jones
City Attorney, City of Idaho Falls
P.O. Box 50220
Idaho Falls, ID 83405
zjones@idahofalls.gov

Skyler C. Johns
Nathan M. Olsen
Steven L. Taggart
OLSEN TAGGART PLLC
P.O. Box 3005
Idaho Falls, ID 83403
sjohns@olsentaggart.com
nolsen@olsentaggart.com
staggart@olsentaggart.com

Dylan Anderson
DYLAN ANDERSON LAW PLLC
P.O. Box 35
Rexburg, Idaho 83440
dylan@dylanandersonlaw.com

David W. Gehlert
Natural Resources Section
Environment and Natural Resources Division
U.S. Department of Justice
999 18th St, Ste 370 Denver, CO 80202
david.gehlert@usdoj.gov

Thomas J. Budge
RACINE OLSON
P.O. Box 1391
Pocatello, ID 83204-1391
tj@racineolson.com

COURTESY COPIES TO:

Craig Chandler
IDWR—Eastern Region
craig.chandler@idwr.idaho.gov

William A. Parsons
PARSONS, LOVELAND, SHIRLEY & LINDSTROM, LLP
wparsons@pmt.org

Jerry R. Rigby
RIGBY, ANDRUS & RIGBY LAW, PLLC
jrigby@rex-law.com

Andrew J. Waldera
SAWTOOTH LAW OFFICES, PLLC
andy@sawtoothlaw.com



Maximilian C. Bricker (ISB #12283)

Attachment 1

Technical Memorandum by Spronk Water Engineers



Memorandum

TO: Sarah Klahn, Esq. and Maximillian Bricker, Esq. (Attorneys for City of Pocatello)
Robert Harris, Esq. (Attorney for City of Idaho Falls)
Candice McHugh, Esq. and Chris Bromley, Esq. (Attorneys for Coalition of Cities)

FROM: Spronk Water Engineers, Inc.; Gregory Sullivan, P.E., and Heidi Netter, P.H.

DATE: August 3, 2026

RE: Preliminary Review of Revised In-Season Demand Shortfall in July 21, 2026,
IDWR Order Revising April 2026 Forecast Supply and Continuing May 14, 2026
Curtailment Order (Methodology Steps 5 & 6)

Spronk Water Engineers, Inc. (“SWE”) reviewed the Idaho Department of Water Resources (“IDWR”) *Order Revising April 2026 Forecast Supply and Continuing May 14, 2026 Curtailment Order (Methodology Steps 5 & 6)* (“July 2026 Order”), including the July Background Information¹ to assess the reasonableness of the predicted shortfalls for the SWC members listed on page 8 and repeated below.

	Forecast Supply (AF)	RISD (AF)	Shortfall (AF)
A&B	107,159	75,747	0
AFRD2	372,009	526,787	154,800
BID	258,042	305,019	47,000
Milner	73,835	70,846	0
Minidoka	356,528	420,893	64,400
NSCC	991,969	1,177,475	185,500
TFCC	980,672	1,270,107	289,400
		Total	741,100

This memorandum was prepared to summarize the results of our analysis with reference to the attached tables.

Table 1 summarizes the Monthly Baseline Demand and Monthly Reasonable In-Season Demand (“RISD”) for each SWC member extracted from IDWR’s DS RISD Calculator for April,

¹July Background Information available from: <https://idwr.idaho.gov/delivery-call-action/swc-2010/>. Last Accessed July 27, 2026.

May, and June. The Monthly Baseline Demand figures are the historical diversions for each member in the 2018 Baseline Year. The Monthly RISD figures for April, May, and June were computed by IDWR based on the Crop Water Need (“CWN”) divided by the monthly Project Efficiency (“PE”).

Also included in **Table 1** is the difference between the Monthly Baseline Demand and Monthly RISD amounts. The most notable result is that the calculated May RISD is substantially greater than the May Baseline Demand for all SWC members. For this preliminary analysis, SWE compared the May RISD for each SWC member to the following two metrics:

- Reported Diversion Capacity; and
- Maximum Historical Diversion in Any Month.

This preliminary review does not attempt to calculate revised RISD values or address all aspects of IDWR’s methodology. Instead, it applies two straightforward reasonableness checks to determine whether the calculated May 2026 diversion demands are physically and historically plausible.

Reported Diversion Capacity

Table 2 compares the Monthly RISD for May to the maximum volume that could be diverted assuming diversions at the reported capacity of the diversion facilities for all 31 days of the month. This is an idealized operating assumption because sustained operation at full capacity may be constrained by hydraulic limitations in the conveyance system, day-to-day demand variations, maintenance requirements, debris and sediment accumulation, equipment outages, and other operational factors.

The diversion capacities for the SWC members were obtained from the 2007 Expert Report prepared on behalf of the Surface Water Coalition for a January 2008 hearing in the SWC Delivery Call matter.² The results show that the calculated May demand materially exceeds the reported diversion capacities for AFRD2, NSCC, and TFCC and slightly exceeds the reported capacities for A&B and BID. The combined calculated demand above the reported capacities is approximately **201,200 acre-feet** (“AF”). The rightmost columns in Table 2 show the monthly volumes converted into average daily rates. See the notes at the bottom of the table for additional details.

² Surface Water Coalition Expert Report prepared by Brockway Engineering, Inc, ERO Resources Corporation, and HDR Engineering, Inc. September 26, 2007 (Appendix A-U Table 8). The A&B diversion capacity was increased to 300 cfs which is the approximate typical maximum diversion since 2016 when a second Snake River pumping plant was constructed to supply lands in the A Unit and B Unit.

Maximum Historical Diversion in Any Month

Table 3 compares the May RISD to each member's maximum historical monthly diversion during 2000 – 2025, which typically occurred in July. These values provide a reasonable empirical upper limit for sustained monthly diversions under actual high demand conditions when the CWN was significantly greater than during May 2026.

The results show the May RISD exceeds the maximum historical diversion in any month for all seven SWC members by a combined total of approximately **250,400 AF**, with AFRD2, Minidoka, NSCC, and TFCC accounting for most of the total exceedance. The rightmost columns in **Table 3** show the monthly volumes converted into average daily rates. See the notes at the bottom of the table for additional details.

Summary

The comparisons presented in **Tables 2 and 3** identify obvious anomalies in IDWR's calculated May 2026 diversion demands. The calculated May demand exceeds the reported diversion capacity for five of the seven SWC members, including material exceedances for AFRD2, NSCC, and TFCC. The calculated May demand also exceeds the maximum historical monthly diversion during 2000–2025 for all seven SWC members. These anomalies are not unique to May 2026. SWE's review of IDWR's SWC Methodology calculations for prior years identified additional instances of excessive monthly RISD values.

These results demonstrate that IDWR's calculated May 2026 diversion demands fail basic reasonableness checks. Because the monthly RISD values directly affect the predicted shortfalls underlying the July 2026 Order, the computed shortfalls are likely materially overstated and should be reassessed.

Table 1

Monthly Baseline Demand v. RISD
Surface Water Coalition Members
April - June 2026

Member	April 2026			May 2026			June 2026		
	(1) Baseline Demand (AF)	(2) RISD (AF)	(3) Diff. (RISD - Baseline) (AF)	(1) Baseline Demand (AF)	(2) RISD (AF)	(3) Diff. (RISD - Baseline) (AF)	(1) Baseline Demand (AF)	(2) RISD (AF)	(3) Diff. (RISD - Baseline) (AF)
A&B	1,800	2,886	1,086	10,007	19,219	9,212	13,857	15,114	1,257
AFRD2	29,163	25,990	(3,173)	74,021	140,106	66,086	81,221	86,205	4,984
BID	15,426	20,368	4,942	44,803	77,469	32,666	56,436	61,635	5,199
Milner	2,447	3,032	585	8,379	18,454	10,075	11,158	12,927	1,769
Minidoka	20,876	31,592	10,716	60,631	108,797	48,165	76,375	83,536	7,161
NSCC	83,370	74,228	(9,142)	155,865	309,358	153,493	193,327	199,789	6,463
TFCC	86,349	90,557	4,207	183,464	322,415	138,951	198,430	203,662	5,232
Total	239,433	248,654	9,221	537,170	995,818	458,648	630,804	662,870	32,066

Notes:

- (1) Monthly Demand for 2018 Baseline Year from backup materials for July 2026 SWC Methodology Order:
DS RISD Calculator_2026_6thMethodology_July_1_2026.xlsx.
- (2) Monthly Reasonable In-Season Demand (RISD) from backup materials for July 2026 SWC Methodology Order:
DS RISD Calculator_2026_6thMethodology_July_1_2026.xlsx.
- (3) Monthly RISD (2) minus Monthly Demand for 2018 Baseline Year (1).

Table 2

Monthly RISD
vs. Maximum Diversion Capacity
Surface Water Coalition Members
May 2026

	AF Comparison				CFS Comparison	
	(1) May 2026 Monthly RISD (AF)	(2) Maximum Diversion Capacity (cfs)	(3) 31-Day Volume at Max Cap (AF)	(4) RISD Exceeding Capacity (AF)	(5) Avg Monthly RISD (cfs)	(6) RISD Exceeding Capacity (cfs)
(a) Member						
(b) A&B	19,219	300	18,447	772	313	13
(c) AFRD2	140,106	1,700	104,530	35,576	2,279	579
(d) BID	77,469	1,254	77,107	362	1,260	6
(e) Milner	18,454	325	19,984	-	300	-
(f) Minidoka	108,797	1,792	110,187	-	1,769	-
(g) NSCC	309,358	3,800	233,656	75,702	5,031	1,231
(h) TFCC	322,415	3,800	233,656	88,759	5,243	1,443
Total	995,818			201,171		3,272

Notes:

- (1) Monthly Reasonable In-Season Demand (RISD) from SWC Methodology for May 2026.
Values from: "DS RISD Calculator_2026_6thMethodology_July_1_2026.xlsx."
- (2) Reported diversion capacity from 2007 SWC Expert Report (Appendix A-U Table 8)
SWC Expert Report (9/26/2007) by Brockway Engineering, Inc, ERO Resources Corporation, and HDR Engineering, Inc., prepared for the Surface Water Coalition Delivery Call.
A&B capacity increased due to second Snake River pumping plant constructed in 2016
(typical maximum diversion ~300 cfs).
- (3) Maximum diversion capacity converted to a monthly volume; (2) x 31 days x 1.9835 AF per cfs-day.
- (4) RISD (1) in excess of Maximum Diversion Capacity (3).
- (5) RISD converted to a daily rate; (1) / 31 days / 1.9835 AF per cfs-day.
- (6) RISD rate (5) in excess of Maximum Diversion Capacity (2).

Table 3

Monthly RISD
vs. Maximum Historical Diversion in Any Month
Surface Water Coalition Members
May 2026

Member	(1) May 2026 Monthly RISD (AF)	(2) Maximum Monthly Diversion (AF)	(3) RISD Exceeding Max Diversion (AF)
A&B	19,219	17,536	1,683
AFRD2	140,106	100,081	40,025
BID	77,469	73,860	3,609
Milner	18,454	16,043	2,411
Minidoka	108,797	88,022	20,775
NSCC	309,358	226,420	82,938
TFCC	322,415	223,466	98,949
Total	995,818		250,389

Notes:

- (1) Monthly Reasonable In-Season Demand (RISD) from SWC Methodology analysis for May 2026:
DS RISD Calculator_2026_6thMethodology_July_1_2026.xlsx.
- (2) Maximum monthly diversion in any month (typically July) during 2000-2025. Monthly diversions with IDWR adjustments for wheeled water and in-season recharge from:
DS RISD Calculator_2026_6thMethodology_July_1_2026.xlsx.
- (3) Monthly RISD (1) in excess of Maximum Monthly Diversion (2).