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Information update regarding Case 69544

To whom it may concern,
Referring to our complaint of March 10, 2011, this is an update on the status of hydropower revisions in Norway. In April 2015, the Ministry of Oil and Energy (OED) concluded in the revision of yet one set of old hydropower licenses. With this letter, we would like to notify the agency about the outcome of this revision and explain our worries about the lack of environmental conditions in the amendment of old licenses so far, which in our opinion is far from the ambitions and intentions of the WFD.

The Årdal River

The amended licenses were given in 1948, to regulate the Årdal, Lyse and Stølsåna Rivers, and to transfer water from the Årdal River to the Lysebotn power plant. Over 63% of the water flow in the river is transferredⁱ.

After the first regulation, additional hydropower permits have been given, which has allowed for the exploitation of more water in the catchment area. This has caused a severe reduction in the water flow in the Årdal River, with serious consequences for biological diversity as well as reduced landscape and recreational values. The regulation of the anadromous stretch of the upper part of the river is considered particularly brutal, due to extremely low water flow. One of the most serious effects of the regulation is that the previously large water flow in summer time, due to the snow melt, is heavily reduced, with measurements in recent summers of below 0.5 m³/s in the upper part of the anadromous stretch.

This is the first revision of hydropower licenses in a river with an anadromous Salmon population. The Årdal River is a regionally important salmon river. It also has a population of the critically endangered eel and several other elements which puts it in the top priority category – 1.1 – for revision in the so called *Screening Report*ⁱⁱ. In the assessment of values and environmental impact in the Screening Report it is stated that:

“The Årdal River (..) is one of the county's three most important salmon rivers with a large population of large salmon. The population conditions for both Salmon and Sea Trout are reduced. The lake Øvre Tysdalsvatnet has a population of “Storørret”, the lacustrine morph of Brown Trout. Reduced water flow in the Storåna, Bjørg and Tusso Rivers is a key impact factor.

(...)

Reduced water flow affects the landscape significantly. In the revision process, considerations of the amount of water flow in the water falls is highlighted, and the need for increased water flow through

Viglesdalen Valley is emphasized. The area is important for outdoor activities and is a gateway to the Lyseheiene mountain area and the trails and cabins of The Norwegian Trekking Association."

In the public consultation it was brought up that the background documentation for the revision does not contain a simulation of various flow regimes for the Stølsåna River. This would have been necessary in order to evaluate how the river is perceived by the tens of thousands of tourists who visit Lysebotn and the spectacular Kjerag mountain and Kjerag boulder every year. The area has outdoor and recreation values of international interest, but this aspect is neglected in the revision process, despite the fact that the Stølsåna River is reduced to a sad sight at low flow levels, with a completely dry riverbed. From our point of view, it is odd that the values for recreation, tourism and nature experience are not given more attention in this revision, since the river is an important landscape element in one of the top 15 most visited places for nature experiences in Norway. In new permits, minimum flow requirements have been set with regards to tourism and nature experience in places with far fewer visitors than Lysebotn and Kjerag.

In regards to the importance of this river for the salmon population, biological diversity in general, and the landscape values, reflected by the top priority ranking in the Screening Report, we would like to express our great concern for the Norwegian authorities' handling of this case.

Minimum flow

*Flow levels*The main problem in the regulation of the Årdal River was the lack of minimum flow requirements in the permit, as for most of the older hydropower regulations in Norway. Due to the complexity of the regulation, some parts of the river are particularly negatively affected.

The most contested issue in the case has been minimum flow in the anadromous stretch of the upper part of the Årdal River. The recommendations from the Norwegian Environment Agency on 30 June 2014ⁱⁱⁱ were that the minimum water flow level should be no lower than 1.5 m³ in the winter and 4 m³ in the summer. The Environment Agency recommended that the summer period be set from 1 May – 30 September, as they reported that the smolt migration in the Årdal River has been around May 10 the last couple of years, with some smolt migrating before this date, why one should avoid low water flow levels in May.

In their final input to the case, in September 2014, the Norwegian Water and Energy Directorate (NVE) suggested a minimum water flow of 1.5 m³ / sec in the winter period and 3.0 m³ / sec in the summer period, set to be 1 May–30 September. In their decision from 17 April 2015, OED departed from NVE's recommendations, and recommended 1.5 m³ / sec in winter and 2.0 m³ / sec in summer, with a staggered summer period from 15 May – 14 October. Minimum summer flow in OED's decision is thus only two thirds of what NVE recommended in its hydrological assessment. The water flow in the summer period is 33 % percent lower than the water flow NVE considered necessary for the anadromous salmon in the Årdal River.

OED justifies the reduced minimum flow with the need for increased energy production. OED's decision stated the following: "*A reduction in summer water flow compared with NVE's proposal would therefore have a significant impact in reduced power loss. The reduction of benefits for fish production this entails is not large enough to offset the benefit of such a loss of renewable energy*".^{iv}

In their conclusion, OED also mentions the fact that there is limited knowledge concerning the condition of the salmon stock prior to the regulation in 1948. First of all – that is only partly true as we know that wealthy people from Stavanger would lease the fishing rights in the Årdal River, and build

villas of their own in Årdal for the purpose of Salmon fishing. And later information has it that Salmon catches of 18 kg in the Årdal river were common, and even 20 kg was not unusual.

Furthermore, if one does not know how much damage the regulation has done, that surely does not reduce the need for quantitative or qualitative data regarding the Salmon stock, but rather increases the requirements for good data as a basis for decision making.

Point of measurement

An other issue of debate related to introducing a required level of minimum flow, is where this flow is to be measured. Throughout this long revision process, NVE and the power company insisted that the flow should be measured at a point called "Kaltveit", which is quite a bit down streams from the point, "Nes" at which the specified minimum flow level is to be secured. The problem is that the flow is substantially higher at the downstream point "Kaltveit", as several small streams join the river between the two points. In their recommendations, the Environment Agency stated that, if "Kaltveit" was chosen as the measurement point, the level had to be set 50% higher to compensate for the added runoff from the Lyngsåna River between "Nes" and "Kaltveit". This was mentioned repeatedly, by several stakeholders, but not taken into consideration in NVE's recommendations to OED in 2003. As even the power company were aware that the flow was higher at "Kaltveit" than at "Nes", a fact that was supported by reports produced by external consultants in the meantime, NVE finally, in September 2014, admitted that their calculations were off, by 50%, and that the flow at the downstream point "Kaltveit", is 50% higher than at "Nes" where one wants to secure the required minimum flow. However, NVE did not agree to move the measurement point to "Nes", as had been proposed by amongst other the County Governor of Rogaland.

Environmental ambitions

NVE estimated that the suggested minimum flow will reduce production with 40 GWh^v whilst the Screening Report states that the estimated and accepted production loss at Q95 minimum flow is between 75 and 100 GWh in the Årdal River.

We would like to reiterate what is stated in the Screening Report on page 34, describing rivers prioritized in category 1.1, which the Årdal River is placed in:

"Rivers in category 1.1 are considered to have a great potential for enhancement of important environmental values, and where relevant measures result in little or moderate loss of production compared to the expected environmental benefits."

The Screening Report considered how important environmental values could be safeguarded through facilitating cost-effective measures like minimum flow. The screening is based on a socioeconomic analysis of the benefits of possible environmental improvements in water bodies affected by hydropower, in relation to the socioeconomic costs in terms of reduced renewable and flexible power production. A power loss of 40 GWh is less than 3% of the total production of the power stations covered by the Årdal revision. In addition, the power company is building a new power plant, "Lysebotn II", which will be completed in 2018 and which will increase the production with 180 GWh, leading to a total of 1500 GWh.

The national Screening Report suggested that there is an unused potential for water flow in the Årdal River, and with the new power plant in place we wish this could have been developed into a win-win project, with improved environmental status in the river whilst securing a great increase in power production.

According to the Screening Report, the increase in river runoff that can be used for hydropower production in Rogaland County was about + 2.7 % in the period 1981-2010 compared to the reference data for the previous 30 years (due to higher precipitation). The average precipitation for Norway has increased by 4% in the period 1985-2014 as compared with 1971-2000 and by 7 % compared with the period 1961-1990.^{vi} ^{vii} The available runoff has already increased more than the suggested minimum water level in the 50 rivers prioritized for revision in the Screening Report. We think some of this additional precipitation should benefit the environment as well, not just the hydropower companies.

The modernization, upgrading and extension projects known to NVE were estimated to add an additional 337 GWh from Rogaland, most of which would be in rivers that may undergo revision. In addition, there are several projects that have been given licenses but that are not yet built - and just in 2015, NVE provided licenses for another 130 GWh new hydropower from Rogaland County^{viii}.

According to the Screening Report, minimum water flow at Q95 in the 50 prioritized rivers would result in a total production loss of about 2,3-3,6 TWh per year, which is about 1,8-2,8 % of the annual production. The size of the reduced production varies between watercourses, and differentiated flow regimes would probably reduce the actual power loss further.

With this in mind, we question OED's decision to set the demands for minimum flow lower than NVE's suggestion.

Natural flow regimes display variability at a range of time scales, including seasonal and inter-annual changes, and native aquatic and riparian biota are adapted to this variability. For this reason, the magnitude, frequency, duration, timing and rate of change of the natural flow regime is generally agreed to be the key elements central to sustaining and conserving native species and ecological integrity. According to the Guidance Document No. 31 - Ecological flows in the implementation of the Water Framework Directive, environmental flow should be considered a tool to achieve a flow pattern that can support viable populations of fish, insects, riparian vegetation etcetera. The definition of environmental flow extends beyond the narrow scope of just summer and winter variation in flow pattern. This has been subject to important research carried out by authorities and researchers in Norway, and NVE has been involved in several research programmes such as the «Miljøbasert vannføring, Fase 1 og 2»- project¹ and have also contributed to publications on environmental design in regulated rivers such as CEDREN's "*Håndbok for miljødesign i regulerte laksevassdrag*"². The latter formed the basis for Norway's participation in the work in relation to the E-flow guidance. However, we see no evidence of Norwegian authorities applying this knowledge in the Årdal revision.

As mentioned in our complaint of 2011, the Norwegian Parliament stated in the Parliamentary Bill Ot. prp. nr. 50 (1991-1992) on the Watercourse Regulation Act that the point of revising old hydropower licenses is to rectify environmental damage, and is meant to be a modernization of the license conditions to get these more in line with modern environmental conditions. The White paper 24 (2000-2001) on the Government's environmental policy, reiterated that the revision of older hydropower licenses is a priority measure to rectify past environmental damage.

¹ Miljøbasert vannføring I,

http://publikasjoner.nve.no/rapport_miljoebasert_vannfoering/2007/miljoebasert2007_01.pdf

Miljøbasert vannføring II,

http://webby.nve.no/publikasjoner/rapport_miljoebasert_vannfoering/2012/miljoebasert2012_01.pdf

² CEDREN, Forseth, T. & Harby, A. (red.). 2013. Håndbok for miljødesign i regulerte laksevassdrag. - NINA Temahefte 52. 1-90 s,

<http://www.nina.no/archive/nina/PppBasePdf/temahefte/052.pdf>

The environmental conditions set for older hydropower permits in Norway are either non-existing or very weak. Because of the apparent lack of will to apply best practices in regards to balancing the two objectives power production and environmental considerations, we claim that the scope of action in regards to the ecological potential is not sufficiently utilized to achieve a higher ecological potential in line with the WFD. Our worry is that this revision shows the level of ambition of OED and may be used as a precedent in upcoming revisions.

The River Basin Management Plans

In the River Basin Management Plan (RBMP), it is made clear that the Water Board of the Rogaland River Basin District, and the Board in the Ryfylke River Basin Sub-District, both agree with the top prioritization of the Årdal River in the Screening Report.

There RBMP does not state specific goals for increase in flow levels after the revision, and the only proposed measurement is simply to introduce minimum water flow. This may be explained by the fact that it is seen as self evident that the Water Board supports the assessment in the Screening Report, and that it makes little sense to spend time on agreeing on details regarding the environmental targets when the case is in the final part of a revision, especially since NVE is also part of the Water Board.

In the Programme of Measures (PoM), the Water Board of Rogaland River Basin District suggests that:

- More licenses should be summoned and revised according to the Water Resource Act §§ 28 and 66
- It ought to be possible to introduce standard requirements for nature management without a full revision. This should be achieved by amending the law, to avoid having to administer and decide in each specific revision in the country
- The County Governors, NVE, the municipalities / River Basin Sub-Districts and the hydropower companies should cooperate to apply standard requirements for nature management, with the water environment in mind, for all licenses.

In the first draft for PoM for the Rogaland River Basin District, there is a passage which describes input to the competent authority in the River Basin District: *“For older hydropower licences without modern environmental conditions, several stakeholders have expressed that they think it makes little sense to give input on the need for measurements in regulated water courses, as the possibility for when the licenses can be revised limits the possibilities to implement the environmental measurements quickly.”*^{ix} (our translation)

This passage is left out in the final PoM, but we still chose to include it, as an illustration of the kind of input that the competent authorities in the River Basin Districts receive. What is included in the final version is the following:

“There are several relatively old hydropower stations in the River Basin District without licences. In many of these, there is a great potential to achieve great environmental improvements by introducing environmental conditions for better safeguarding of the water environment, without a big loss of hydropower generation. To introduce environmental conditions in such hydropower regulations, the installation must be summoned for licensing according to the Water Resources Act section 66, or be made subject to revision of the conditions according to Water Resources Act section 28. These provisions can be used in “exceptional cases”, but are rarely used. So far, there has been a high threshold for summoning of old unlicensed regulations, compared with revising licences with a given revision interval, according to the Watercourse Regulation Act. If the revision possibilities according to the Water Resources Act are much weaker than the possibility of a revision at a set time interval according to the Watercourse Regulation Act, then that is a serious imbalance between the two sets of

laws. If that is the case, then the Watercourse Regulation Act sections 66 and 28 are insufficient tools for conducting the most cost efficient and most important measures for environmental improvements in regulated watercourses. According to the letter with instructions concerning rivers with hydropower, dated 24 January 2014, environmental goals of the Water Regulation Act (“vannforskriften”) can pass as “exceptional cases”. These national instructions refer to that the RBDs are to estimate the environmental improvements based on cost-benefit analyses of possible measurements. This is the responsibility of the watercourse authority NVE.”^x

The River Basin Management Plans include an assessment of significant impacts affecting water bodies. Hydromorphological pressures and altered habitats are reported for a large proportion of classified water bodies, with approximately one third of Norwegian water bodies affected by hydropower development and 70% of the largest river systems in Norway being regulated. (Of the 20 highest waterfalls in Norway, 15 are regulated for hydropower production.)

In Norway, 50 rivers have lost or may lose their anadromous populations as a direct result of hydropower.ⁱⁱ Of these, 34 were Salmon stocks. Another 19 populations are or may be lost, where hydropower regulations are a contributing cause. The pressure from hydropower regulations is one of the main threats to anadromous species in Norway, and must be seen together with other pressures, such as that of escaped farmed salmon and salmon lice, which puts the salmon stocks in some 220 rivers in the categories poor, very poor, critical or lost^{xi}.

The most common mitigating measures to ensure viable populations of anadromous fish in regulated rivers is to ensure minimum flow, dam restrictions and habitat improvement measures. Freshwater pearl mussel, eel, crayfish and the coast tiger beetle are examples of endangered species in Norway where river regulation has significantly contributed to these species' decline.

It is essential that new hydropower, upgrading/expansion of existing power plants and revision of old license conditions are considered and dealt with in a coordinated manner by the authorities. The RBMPs are supposed to contribute to this overall assessment of the water bodies, with objectives and actions that best reflect the challenging balance between power generation, natural environment and other relevant public interests in and around a waterbody. The competent authorities in the River Basin Districts may prioritize other water bodies than what is suggested in the national Screening Report, in accordance with local knowledge and needs. This is however heavily detested by the energy sector and NVE, who still claim that the priorities in the Screening Report are to be followed^{xii}.

The Årdal River is categorized as a natural waterbody (**not** heavily modified) with good ecological status as the environmental objective. The waterbodies are said to be at risk of not reaching the environmental objectives by 2021, and the ecological status is poor. The proposed measurements presented in vann-nett are to map issues of concern, and, for the lower part, meander restoration and re-opening of tributary streams. The RBMP and PoM also mention revision of the hydropower license as a measurement, to get minimum water flow, but there are no specific flow levels mentioned. However, with the environmental ambition of reaching good ecological status, it seems evident that the river needs more water, with minimum levels set more in line with the recommendations from the Environment Agency.

Current situation of revisions

The revisions conducted so far have not improved the environmental conditions of the regulated rivers to the expected extent. In the handling of the Årdal River revision OED claims that (emphasis added):

"aggravating conditions relating to the minimum flow should only be imposed where special considerations warrant it."

In NVEs recommendations to OED, of 26 March 2003, regarding the revision of the licenses for the hydropower regulations in the Årdal River and Stølsåna River, NVE gives some general comments on page 62, which reads as follows:

"The feedback in the public consultation strongly suggests that those who have given their input have a different opinion about what the revision of environmental conditions in a licence compiles than that NVE has prepared for based on the instructions in the Ot.Prp. Nr, 50 (1991-1992) and later conclusions on complaints and political decisions. Most of the replies, for instance from the two municipalities concerned, state that the revision document does not give enough background information for the case to be sufficiently informed. For instance, the municipalities claim that potential measures to stimulate fish production and to improve the landscape and environment aspects, is not sufficiently investigated to serve as a base for designing and proposing specific conditions to be added to the license. Many of the respondents claim that the costs of the measures should have been investigated more thoroughly. (...)

NVEs interpretation of the preparatory work leading up to the amendment of the law, in the Parliamentary Bill Ot.prp. nr. 50 (1991-1992) on the Watercourse Regulation Act, is that a revision process should give stakeholders a possibility to point at the damages and inconveniences for public interests which are caused by the regulation. It is up to the stakeholders to point at where the problem is. It is not our (NVE's) opinion that the licence holder is responsible to investigate in order to find this out." ^{xiii} (our translation)

We wish to underline that, throughout this 17 year long revision process, the municipalities, environment and outdoor organisations and other interests have surely pointed at the damages and inconveniences that the regulation has caused, and have also pointed at the many faults and weaknesses in the background reports. Both those of NVE and of the power company Lyse.

All of the respondents, except the power company, have expressed their concerns regarding the environmental impact and other inconveniences caused by the regulation, and have based their demands for environmental conditions on these concerns, including in their public consultation statements ^{xiv}. We also reject that the responsibility for investigations is put on other stakeholders than the license holder.

Just recently, NVE has invited for a public consultation regarding the revision of the licenses for the regulation of the rivers Sira and Kvina. The two municipalities behind the revision request write, that *"NVE wishes that such demands are put forward and coordinated by the municipalities. In addition, the situation is such that in the absence of a clear regulatory framework or a directive, a certain uncertainty prevails, regarding which conditions that can be put forward for revision, the degree of details needed in the problem descriptions, the expected degree of investigations etc."*^{xv} This and the above is just to illustrate that there is still ambiguity and ill-defined procedures.

OED concludes on page 155 in the Årdal revision document that the four earlier revisions have helped clarify questions regarding how to carry out a revision. OED explains that several juridical issues had to be clarified, which is why the revision of the Årdal River and the other revisions up until now have taken so long.

In a letter dated 19 March 2014, NVE provided input to the process on RBMPs and PoMs in Rogaland County, writing that *"The amount of time spent on revision work may push the authorities to consider*

using other tools to achieve the environmental improvements indicated by the cost-benefit analyses prompted by the Water Regulation Act.” NVE also states that they will “consider simplifying the formal procedures within its area of responsibility.”

We mention this to illustrate that the revision institute as per today is difficult to grasp, even for the authorities, and that, in practice, it is a poor tool to achieve the environmental improvements according to the WFD.

Weaknesses in OED’s conclusion

In the national Screening Report, where the Årdal River was put in the top category for revision, it was estimated that there was a big potential for environmental improvements, whilst the suggested measures were only assumed to cause a limited loss of power production compared with the expected environmental gains.

In the introduction of the revision document, OED refers to the intentions of the Watercourse Regulation Act and the following section from the Proposition to the Parliament (Ot.prp.nr. 50 (1991-1992)) (emphasis added):

“Moreover, it could be considered to impose conditions for minimum flow in a license or to revise old conditions for minimum flow, but one needs to be cautious with new, more stringent conditions for water release. Imposing such conditions may lead to large losses in power production. More stringent conditions for minimum water flow should therefor only be imposed where special circumstances call for it”.

OED then continues, putting this piece of text into a context with references from later guidelines etc. But in their final conclusions, they still return to this very piece of text (on page 157 in the revision document), and quote further from the parliamentary bill, about the possibility to impose minimum water flow (emphasis added):

“These are changes that automatically mean loss of production for the license holder. Stringent conditions for minimum water flow should only be imposed when special circumstances call for it. In older licenses, changing the way the regulation is managed must be weighed against the prevailing conditions in the water course, which have been established as an effect of the regulation.”

OED continue their conclusions like this:

“Our point of departure is that stringent conditions for minimum water flow should only be imposed where special circumstances demands it, also see OEDs guidelines for revision, page 27 ff. If such measures are to be used when revising a license, depends on how the assessment of values and potential of that area, and how the mitigating measure will affect those values and what the loss of production and cost of the measure will be. Imposing minimum water flow must be considered with the established conditions in the watercourse in mind. Both the loss of the licence holder and the national loss of power production must be considered.

(...)

In the Parliamentary bill no 32 (2006-2007) about the protection of wild salmon and the regulation of national salmon rivers and salmon fjords, it is made clear that the wild salmon is to be a key elements to assess in the revision of hydropower licenses. It is however made clear here as well that, as a main rule, measures that will lead to substantial reduction in the power production, should not be imposed.”(our translation and emphasis)

We would like to reiterate that OED systematically underestimates the impact of the Water Regulation Act and the Parliament's views on implementation of the Water Framework Directive, as stated in Recommendation. S. No. 131 (2008-2009):

"The committee believes that the action plans that shall be prepared in accordance with the directive, must incorporate revisions of hydropower permits. In particular, it is important to achieve real environmental improvements where there are no requirements for minimum flow today. Eventually the revision intervals should be synchronized with the revision of the RBMPs, as the directive requires. The committee would point out that it generally is much room for improvement at many levels in old hydropower plant, where the potential for environmental improvement can be great with just a marginal increase in water flow." ^{xvi}

Norway is a net exporter of some 4 TWh per year and has been so for the past 20 or so years. This is because Norway is blessed with such potential for renewable energy production. But it is obvious that OED's decision to reduce the minimum flow in the summer period by a third of what NVE recommended (from 3.0 to 2.0 m³/sec) has very little to do with securing the national energy supply.

As earlier stated, the Årdal River is in the top category in the Screening Report with an indicated loss of some 75-100 GWh per year, it is one of the three most important Salmon rivers in the county and also has Sea Trout and Eel. Although not a relevant element to the WFD, another factor that should be considered by the Norwegian authorities, according to the OED guidelines ^{xvii}, is the fact that the Årdal River is an important landscape element in an area popular for trekking and that it can be seen from the Kjerag, which is one of Norway's most popular nature tourist destinations. With all this in mind, if a river like the Årdal River can not have more water returned to its river bed, then we are very pessimistic about Norway meeting its obligations in the WFD and the idea of improving the water environment through hydropower revisions.

To conclude, we still see no adjustment in revision intervals, which we claim should be six years in line with the RBMP cycle. There is also still a long way to go to adapt the revisions of environmental conditions to the integrated water management of the WFD.

When the outcome of an important revision such as in the Årdal River shows such a lack of environmental ambitions, we find it even more alarming that the next access to improve the environmental conditions in the Årdal River permit is not until in 2045.

The audit process took 17 years and led to lots of frustration due to NVE's, and thereafter OED's, way of dismissing the points / contributions from other authorities, researchers, biological consultants and the local and regional NGOs, such as the anglers' association, the river owners and the association Norwegian Salmon Rivers.

We believe that the outcome in the Årdal revision is unbalanced when it comes to rectifying the damage caused by this heavy regulation and it demonstrates that Norway does not meet the standards required by the WFD.

We are happy to provide you with more information

Best regards,
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- ⁱⁱ The Screening Report:
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^{xiv} Documents in the revision process of the Årdal-Stølsåna Rivers:

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^{xv} Demands for revision of the Sira-Kvina licenses, November 2009,

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^{xvi} Recommendations from the Parliament's Standing Committee on Energy and Environment, regarding the Proposition to implement the WFD in Norway, (Innst. S. nr. 131 (2008–2009) (Innstilling til Stortinget fra energi- og miljøkomiteen, St.prp. nr. 75 (2007-2008)),

<https://www.stortinget.no/Global/pdf/Innstillinger/Stortinget/2008-2009/inns-200809-131.pdf>

^{xvii} OED's revision guidelines, «Retningslinjer for revisjon av konsesjonsvilkår for vassdrags-reguleringer»,

https://www.nve.no/media/2274/retningslinjer-for-revisjon_25mai_siste.pdf