

DOCKETED

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*Comment Received From: Steve Uhler
Submitted On: 11/26/2018
Docket Number: 01-AFC-19C*

Dear Energy Commission Commissioners, tell me about staff's training and private agreements with SMUD

Dear Energy Commission Commissioners,

Please tell me about your staff's training and private agreements they have made with SMUD.

Please discuss these these points I have made here during the agenda item where you will take action on the SFA petition at the business meeting. Please discuss before I comment prior to you voting.

Steve Uhler
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Additional submitted attachment is included below.

Dear Energy Commission Commissioners,

Please tell me about your staff's training and private agreements they have made with SMUD.

Why is it that your staff say they are not certain what is meant by "Plant IDs" in [Cosumnes Power Plant - Petition to Amend - AGP Upgrades - Staff Analysis](#) TN225863 of proceeding 01-AFC-19C for SMUD Cosumnes Power Plant - Compliance?

Perhaps there is a training issue?

See PDF page 12 of [TN225863](#)

Uhler Comment #2:

What are the CEC Plant IDs for the generation in Table 4?

Response #2:

Energy Commission staff is not certain what is meant by "plant IDs for the generation in Table 4." These are not power plants that were licensed by the Energy Commission. The plant names and output (MW) generally serve as an identifier for power plants.

The CEC has a number of IDs that have been given to power plants as shown below, such as CEC RPS Certification Number, CEC ID Number and CEC Plant ID Number. The Energy Commission tracks power plants with these IDs, licensed by the Energy Commission or not.

The below is found in [RPS Verification Report Commission Report, Adopted August 1, 2007 – CEC-300-2007-001-CMF.PDF](#) on PDF page 50 for example of CEC plant IDs.

Pacific Gas and Electric Company's Modified 2004 CEC-RPS-Track

Facility Name	Fuel Type	CEC RPS Certification Number ¹	EIA Number ²	CEC ID Number ³	CEC Plant ID Number ⁴	ISO Resource ID Number ⁵	QF ID Number ⁵
A.G. WISHON PH	Small Hydro	60032E	293	NA	H0570	WISHON_6_UNITS	NONE
ALTA PH	Small Hydro	60033E	214	NA	H0005	BNNIEN_7_ALTAPH	NONE
ALTAMONT MIDWAY LTD	Wind	60118E	50001	20019	W0007	NA	16W009
ALTAMONT POWER LLC (3-4)	Wind	60119E	10581	20074	NA	FLOWD2_2_UNIT 1	16W014
ALTAMONT POWER LLC (4-4)	Wind	60120E	10581	20074	NA	FLOWD2_2_UNIT 1	16W015
ALTAMONT POWER LLC (5-4)	Wind	60121E	10581	20074	NA	FLOWD2_2_UNIT 1	16W016
ALTAMONT POWER LLC (6-4)	Wind	60122E	10581	20074	NA	FLOWD2_2_UNIT 1	16W017
Total Claims from the Altamont Power LLC Facilities							

Your staff say the below on PDF page 12 of [TN225863](#)

Uhler Comment #3:

Has the Energy Commission verified the modeling?

Response #3:

Staff is not certain what is meant by "verification," but the study results are what staff expected.

From where do they get their expectation?

Was the expectation from the “family of models” the Energy Commission uses, as spoke of by Energy Commission Chair Robert B. Weisenmiller, Ph.D. Appointment Designation: Engineer/Scientist, in this video clip <https://youtu.be/yjlk15hMRGE>

Is it possible that staff have overlooked these models and the models went unused in confirming the errors in table 4 have no effect on the result or if the result can be arrived at with the given product structure. In other words did they just assume the results are correct?

Has the Energy Commission made another private agreement with SMUD not to use the tools at hand to check SMUD's results. By private agreement, I mean like the private agreement the Energy Commission made with SMUD for Power Source Disclosure notwithstanding Title 20, 1393.

See [TN225914_20181116T142943_Transcript_of_1172018_Business_Meeting.pdf](#) PDF page 142.

15 If there are concerns about SMUD's reporting we
16 absolutely will follow up with Mr. Uhler. We have looked
17 into his questions previously. SMUD was allowed to
18 aggregate its reporting for multiple programs previously
19 and we have provided all of the previously submitted power
20 content labels.

I have asked to inspect this private agreement for SMUD power source disclosure, your staff have not provided me with the details of this private agreement.

Will I find that my effort here is for not because of another undisclosed private agreement between the Energy Commission and SMUD?

Please note that your staff did not summarize all of my comments, please review the comments they overlooked, [TN224946](#), [TN224947](#), [TN224948](#), [TN224980](#), [TN224983](#) and [TN225800](#).

Please review these natural gas transmission and storage [health, safety, and environmental guidelines](#) and tell me if you are aware of these guidelines and how they are applied and monitored in Sacramento county. Do the guidelines mean there is a change in circumstances that should be considered in the petition?

Please discuss these these points I have made here during the agenda item where you will take action on the SFA petition at the business meeting. Please discuss before I comment prior to you voting.

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