

DOCKETED

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AFC, Objection to Statement of Staff, simple cycle operation petition, 01-19C

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Dear Energy Commission Commissioners,

Please reject the petition and statement of staff for Cosumnes Power Plant simple cycle operation for lack of completeness.

Steve Uhler
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Additional submitted attachment is included below.

AFC, Objection to Statement of Staff, simple cycle operation petition, 01-19C

Dear Energy Commission Commissioners,

California Code of Regulations, title 20, section 1769 requires a project owner to petition the CEC for the approval of any change the project owner proposes to the project design, operation, or performance requirements of a certified facility.

Commission staff have failed to ensure the petitioner provided a complete description of the proposed change to Cosumnes Power Plant (CPP), and the effects on the public caused by the change.

Petition states "The operation of the CPP combustion turbines simple-cycle configuration is a technology modification". There is not a description of this modification of operation in the petition.

The petition lists six (6) reference documents, no Energy Commission docket transaction numbers are given.

Docket 01-AFC-19 lacks hyperlinks for most of the documents listed in 01-AFC-19
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=01-AFC-19>.

Attached document "Email Two.pdf" is my effort to obtain all six (6) documents. Two (2) of the documents were not made available through the docket system. One of the documents staff believed responsive to my request had no docket transaction number and has a different number of pages than listed in the docket. One document has not been provided.

Perhaps the petitioner is not aware that a regulation the project must follow was overlooked. Title 20 section 1208(c) places the responsibility to ensure that a document has been timely filed rests with the person, party, or entity that desires the document to be filed.

Commission staff appear unaware of 1208(c) requirements, see attached "Email One" where I point this fact of the 1208(c) requirements, to commission staff. I suggest the petition should of be rejected for lack completeness.

The statement of staff is the summary of the petition. Pursuant to 1769(a)(1)(A), the summary shall be concise and understandable, shall describe the content of the petition using the applicant's own words whenever possible. Perhaps staff found it impossible to use the petition's section numbers and titles in creating a summary of the petition, none appear in the statement of staff. This is a reason by itself to make objection to the statement of staff.

The CPP simple cycle petition must contain certain information.

Section 1769(a)(1)(F) requires a discussion of how the proposed change would affect the public. This section does not limit discussion of effects on the public to only significant, adverse, or environmental effects.

Section 4 of the petition, titled Potential Effects on the Public, claims the project would have no adverse effect on the public, without discussing what effects were considered.

The statement of staff does not summarize the contents of section 4 of the petition. Staff have failed the ensure complete discussion of effects on the public caused by the requested change. Perhaps staff have overlooked housing policies that require renewable energy, and climate policies effects the change may cause that affect the public.

Commission staff have failed to ensure the project will continue to comply with paragraph 1769(a)(3)(A)(iii) requirement that the change would not cause the project to fail to comply with applicable regulations section 1769(a)(1)(A) and 1769(a)(1)(F).

In order to try to prevent my objection, I believe I have made ample effort to obtain the missing information from commission staff.

Attached to this document are examples where climate policy goals may suffer while running in simple cycle. Please review attached power content labels (PCL) identified as PCL-SMUD-XXXX.pdf. Please note SMUD delivers very little renewable energy to customers of the green pricing programs listed in the power content labels.

Attached are some BANC balancing authority charts identified as ba-banc-yyyymmdd-dow.htm, based on EIA data. Please note the amount of renewables balanced and that BANC does not claim to balance wind generation. SMUD offers green pricing programs that require RPS Portfolio Content Category 1 (PCC1) renewables. I believe the amount of PCC1 renewables will be lower while running CPP in simple cycle. This will effect the greenhouse gas amounts for the delivered energy sold to retail customers and housing policies that require renewable energy.

Please ensure the public is informed about how the requested changes to CPP effect housing policies that require renewable energy, and meeting climate policy goals.

Please reject the petition and statement of staff for Cosumnes Power Plant simple cycle operation for lack of completeness.

Steve Uhler
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