

DOCKETED

Docket Number:	01-AFC-19C
Project Title:	SMUD Cosumnes Power Plant - Compliance
TN #:	244297
Document Title:	July 29, 2022 Email Response to Mr Uhler's Objection
Description:	July 29 2022 Response to Mr. Uhler's Objection to Cosumnes Power Plant Simple-Cycle Petition and Staff Approval."
Filer:	susan fleming
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	8/2/2022 4:43:43 PM
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In response to Steve Uhler's document titled, AFC, Objection to Statement of Staff, simple cycle operation petition, 01-19C, Staff references the following email sent to Mr. Uhler on July 29, 2022.

Follow-up on CPP Questions

Huber, Elizabeth@Energy <Elizabeth.Huber@energy.ca.gov>

Fri 7/29/2022 6:10 PM

To: sau@wwmpd.com <sau@wwmpd.com>

Cc: Babula, Jared@Energy <Jared.Babula@energy.ca.gov>;Dyas, Mary@Energy <Mary.Dyas@energy.ca.gov>;Energy - Public Advisor's Office <publicadvisor@energy.ca.gov>;Gallardo, Noemi@Energy <noemi.gallardo@energy.ca.gov>

 2 attachments (2 MB)

TN227566_20190409T083715_Sacramento Municipal Utility District Final RPS Verification Results Repor (1) (1).pdf;
TN217317_20170427T142045_RPS_Eligibility_Guidebook_Ninth_Edition_Revised.pdf;

Hello Mr. Uhler,

My name is Elizabeth Huber and I manage the Safety and Reliability Office, which includes the work by the CEC's compliance project managers regarding project change petitions. This email is our attempt to combine our outstanding responses to your different emails to Mary and Jared.

In reference to your July 27 email comment regarding California Code of Regulations title 20, section 17699a)(1)(F) that requires the petition to discuss how the project change will affect the *public*. The CEC's staff's analysis of the petition is required to address whether the project change would cause a significant effect on the environment. While it's not explicit, the public is a part of the environment. Our staff analysis did address the relevant effects of the change on the public (people): air quality, public health, noise, hazardous materials, and environmental justice to name a few.

In the same dated email, you also inquired about SMUD's ability to meet their RPS requirements. In the case of the petition, which was filed the SMUD Financing Authority, they do not have to address how they will meet RPS requirements as such a system wide analysis is not a component of or relevant to the petition submitted to allow Cosumnes Power Plant to temporarily operate in simple cycle.

With that said, we are providing (attached) the CEC's RPS Eligibility Guidebook and their most recent approved RPS Verification Results Report. Further, we are providing links to SMUD's Strategic Plan to get to 100 percent clean and renewable energy by 2030.

<https://www.smud.org/-/media/Documents/Corporate/Environmental-Leadership/ZeroCarbon/2030-Zero-Carbon-Plan-Executive-Summary.ashx>

<https://www.smud.org/-/media/Documents/Corporate/Environmental-Leadership/ZeroCarbon/2030-Zero-Carbon-Plan-Technical-Report.ashx>

In your July 29, 2022, email you state, "As a result of docket not providing the missing links and lack of discussion of the climate policy effects to public, I find I must object to SMUD's petition and commission's statement of staff for the request to run simple cycle for the Cosumnes Power Plant." Please know that CEC staff has noted your objection. The California

Code of Regulations title 20, section 1769(a)(3)(C) sets forth the scope of an objection to a staff approved petition. The status of hyperlinks in a docket or lack of discussions of climate policy are outside the scope of the provision and thus not a basis for an objection.

CEC staff has made every effort to provide you with documents and/or links to documents you have requested and hopefully after reviewing these materials, your concerns or questions will be addressed.

Have a nice weekend.

Thank you,
Elizabeth

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