

<b>DOCKETED</b>	
<b>Docket Number:</b>	01-AFC-19C
<b>Project Title:</b>	SMUD Cosumnes Power Plant - Compliance
<b>TN #:</b>	244299
<b>Document Title:</b>	Steve Uhler Comments - AFC, Facts of my objection, TN244275
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Steve Uhler
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*Comment Received From: Steve Uhler  
Submitted On: 8/2/2022  
Docket Number: 01-AFC-19C*

**AFC, Facts of my objection, TN244275, 01-19C**

AFC, Facts of my objection, TN244275, 01-19C

Looking forward to the Energy Commission Commissioners consideration of my Objection to Statement of Staff, simple cycle operation petition at an open public meeting.

Steve Uhler  
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*Additional submitted attachment is included below.*

AFC, Facts of my objection, TN244275, 01-19C

Perhaps commission staff have overlooked that SMUD's RPS compliance requirements are not spoke of in my formal objection to statement of staff and SMUD's petition for simple cycle operation (TN244275).

SMUD's RPS compliance requirements do not apply to the petition, statement of staff, and my objection. How the public is affected does apply pursuant to 1769(a)(1)(F) regardless of severity.

Just as my objection must make a showing supported by facts that the change does not meet the criteria in this subdivision. Staff's speculation, argument, conjecture, and unsupported conclusions or opinions are not sufficient to support staff's approval of the change the petition is requesting.

Fact: There is no description of the technology modification for operation of the Cosumnes Power Plant in simple cycle in the petition.

Perhaps the petitioner meant to say "design" in place of "technology"? SFA removed the low-pressure steam turbine rotor to eliminate the possibility of damaging the steam turbine. The petitioner does not explain how removal of the low-pressure steam turbine rotor changes the technology.

Perhaps the power plant operational control system requires a computer hardware or software (technology?) change (modification) to operate in simple cycle? Maybe the control system does not have, for lack of a better term, a "Simple Cycle" button?

Fact: Staff did not ensure that documents referenced in the petition and statement of staff were properly filed in the docket per title 20 subsection 1208(c). Either did not ensure when referenced by the petitioner or staff, that documents are always referenced by docket transaction numbers, if they apply.

Fact: Staff does not reference petition section numbers while summarizing the petition. The summary is not concise.

Fact: Title 20 paragraph 1769(a)(1)(F) does not use the word "environmental" when referring to the public.

Fact: The public can be affected by effects that are not environmental. 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. Without facts to back up the statement, it is only an opinion.

Fact: Renewable energy that meets Portfolio Content Category 1 (PCC1) level environmental attributes may be claimed for programs other than California Renewables Portfolio Standard Program compliance.

Fact: Title 24 regulations require PCC1 level environmental attributes for the California Energy Commission (CEC) approved Sacramento Municipal Utility District's (SMUD) Neighborhood SolarShares Program, a proposal for community solar under the 2019 Building Energy Efficiency Standards (Energy Code).

Fact: Power Source Disclosure program requires PCC1 level environmental attributes to avoid showing greenhouse gases associated with electricity delivered.

Perhaps In commission staff's response to my document titled, AFC, Objection to Statement of Staff, simple cycle operation petition, 01-19C, staff overlooked the power content labels (PCL)? PCLs allow SMUD customers to see how their energy use may effect the environment. Any change in PCC1 level environmental attributes effects the public.

Fact: TN227566\_20190409T083715\_Sacramento Municipal Utility District Final RPS Verification Results Repor (1) (1).pdf provided by commission staff is not responsive to my records request.

Perhaps commission staff are disadvantaged by SMUD's failing to ensure SMUD filed by July 1, 2021, SMUD's RPS reports for Renewables Portfolio Standard Compliance Period 3 (2017 - 2020) Verification and Compliance? See docket 21-RPS-01  
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-RPS-01>.

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