

**DOCKETED**

<b>Docket Number:</b>	01-AFC-19C
<b>Project Title:</b>	SMUD Cosumnes Power Plant - Compliance
<b>TN #:</b>	225963
<b>Document Title:</b>	Steve Uhler Comments Dear Energy Commission Commissioners, Please confirm the capacity of SMUD's Hedge Power Plant
<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: 11/27/2018  
Docket Number: 01-AFC-19C*

**Dear Energy Commission Commissioners, Please confirm the capacity of SMUD's Hedge Power Plant**

Dear Energy Commission Commissioners,

Please confirm the capacity of SMUD's Hedge Power Plant.

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 confirm the capacity of SMUD's Hedge Power Plant.

SMUD claims Hedge Photo Voltaic Power Plant is 1.5 MW, please compare this photo of Hedge with photo of a 1 MW photo voltaic power plant.

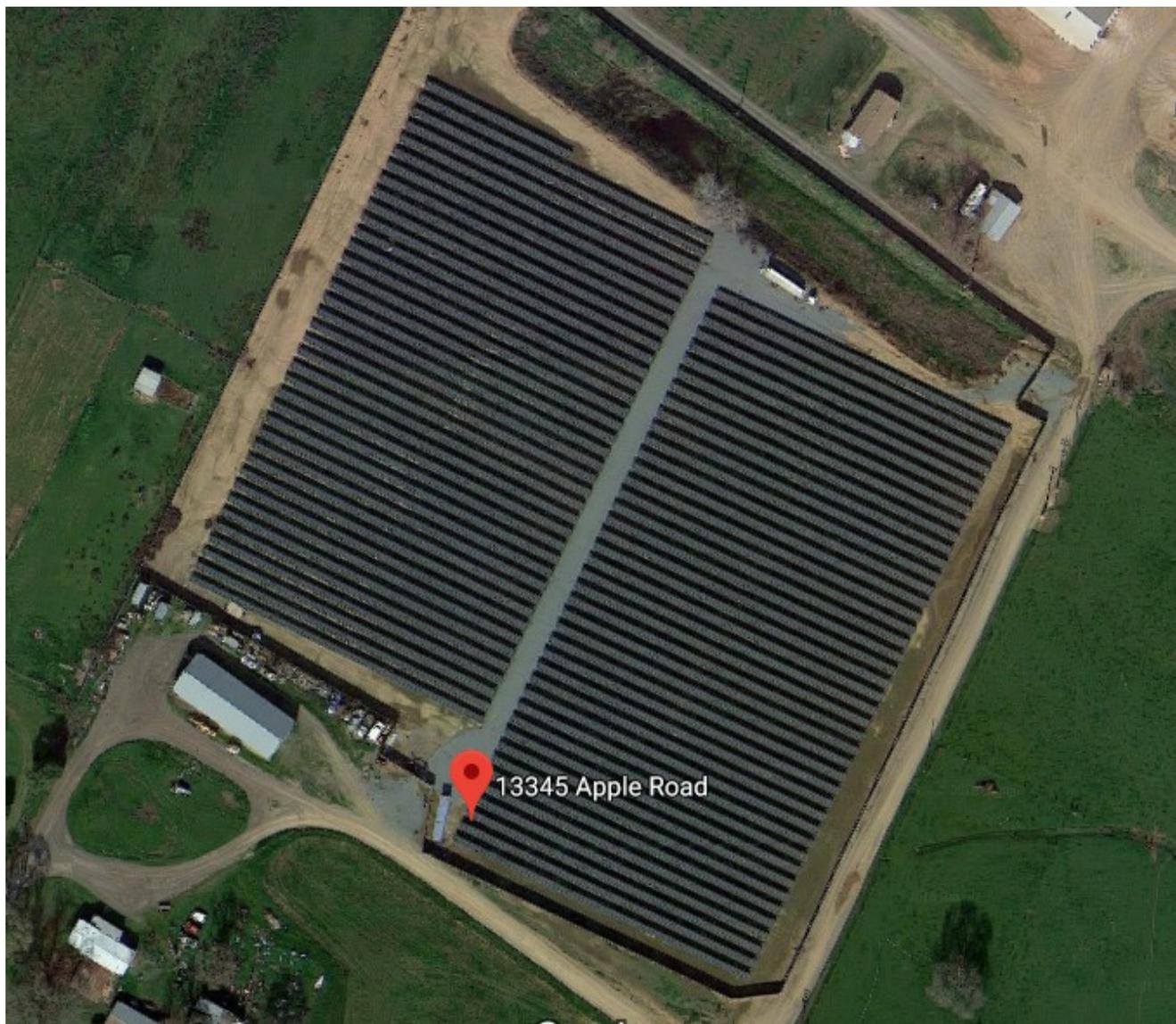
Why does SMUD claim Hedge Power Plant capacity is 1.5 MW?

What other incorrect conditions are there in the NERC modeling in SFA Cosumnes Supplemental PTA NERC Compliance Documentation ([TN224837](#))? Conditions are things such as equipment set, capacities, and timings.

[SMUD's Hedge Photo Voltaic Power Plant CEC RPS ID 60687](#)



Photo Voltaic Power Plant CEC RPS ID 60703 Capacity 1.0 MW



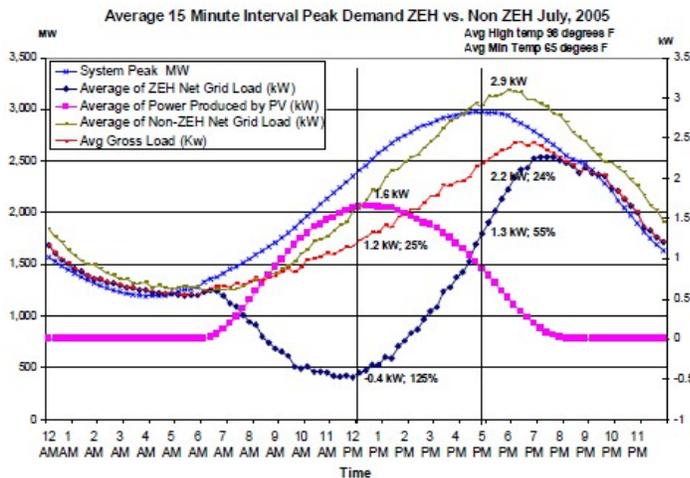
Please note width of roadways is about the same in each photo, the scale in each photo is about the same.

Based on a comparison of photos, Hedge power plant does not appear to have the capacity of 1.5 MW.

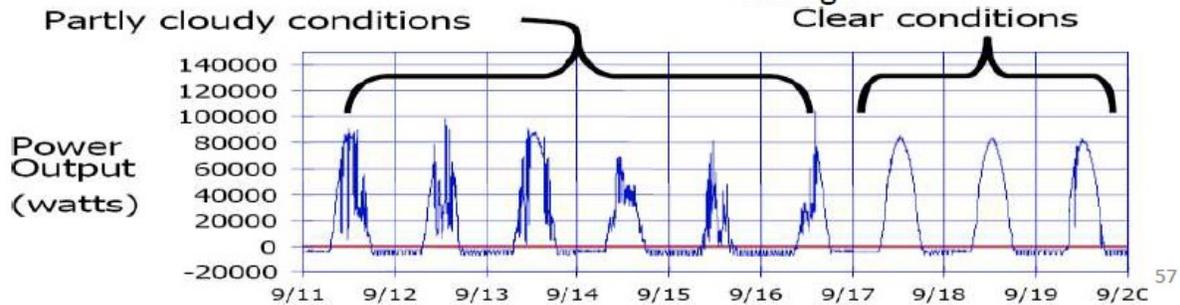
Why are there no charts like these in the modeling report?

[How were these conditions modeled?](#)

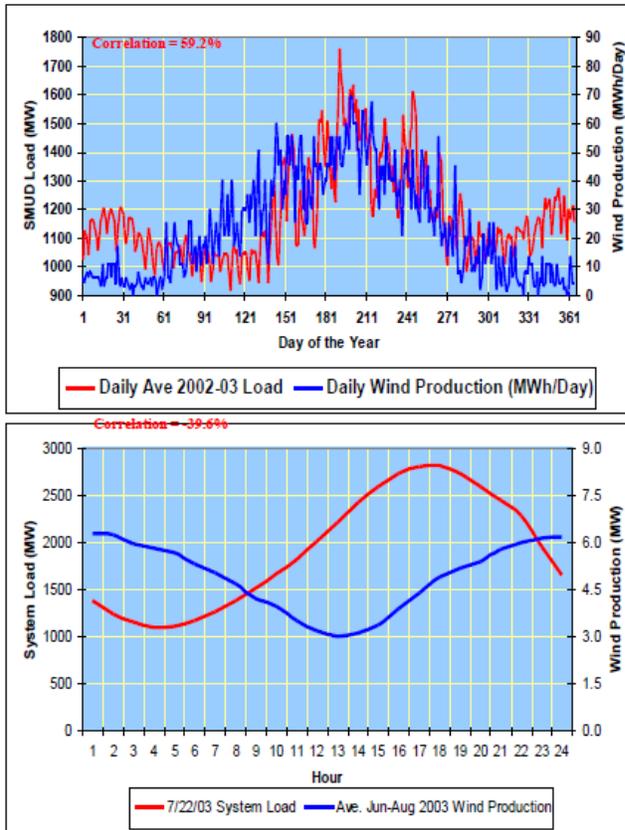
# PV Issues For SMUD



- PV coupled + high efficiency measures can reduce home peak load by 55%
- Significant shift still between solar peak and system peak
- Variable production resulting from party cloudy conditions
- **R&D** Projects: 1. CPUC High Penetration PV Initiative; 2. DOE PV Li-Ion Distributed Storage; 3. DOE Flow Battery Storage



## Wind Issues For SMUD



- SMUD's peak load driven by hot summer temperatures
- Wind resource weakest on hottest days
- Comparing daily and hourly system load with Solano Wind Plant production illustrates mismatch
- Must rely on firming resources to address mismatch and ensure system stability

Without CEC verification of the conditions used to model, the SFA Cosumnes Supplemental PTA NERC Compliance Documentation ([TN224837](#)) may be invalid.

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