

**BEFORE THE
AIR RESOURCES BOARD
OF THE
STATE OF CALIFORNIA**

**SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
COMMENT ON PROPOSED 15-DAY MODIFICATIONS TO
REGULATION FOR REDUCING SULFUR HEXAFLUORIDE EMISSIONS
FROM GAS INSULATED SWITCHGEAR**

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I. INTRODUCTION AND SUMMARY

The Southern California Public Power Authority (“SCPPA”)¹ respectfully submits this comment on the proposed 15-day modifications issued on September 9, 2010 (“Proposed Changes”) to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear (“SF6 Regulation”).

SCPPA is also a signatory to the comments by the Utilities Group on the Proposed Changes, and fully supports the positions put forward in that paper.

SCPPA appreciates that the Proposed Changes have addressed many of the concerns of the utilities regarding the SF6 Regulation. However, some issues remain. In addition to the concerns set out in the submission by the Utilities Group, SCPPA considers that the following changes should be made to the SF6 Regulation:

- The requirement to calculate average system nameplate capacity with reference to the number of days each piece of equipment is active would be data-intensive and time-consuming, and prone to errors given the large number of calculations involved. A simpler approach should be used: calculate the number of whole months (rather than days) that each piece of equipment was active. This approach tracks changes in nameplate capacity in a more manageable way and will be less prone to calculation errors, without any significant effect on the accuracy of the overall emissions rate. In addition, this method would not require changes to current record-keeping practices and

¹ SCPPA is a joint powers authority. The members are Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles Department of Water and Power, Imperial Irrigation District, Pasadena, Riverside, and Vernon.

would therefore save resources – important when considering that many utilities will have to prepare two separate SF6 reports each year.

- Emissions from jointly-owned GIS equipment and the nameplate value of that equipment should be allocated to the GIS owners based on ownership share. It is important to include this provision in the SF6 Regulation to avoid the potential for confusion and overlap when calculating data such as decreases in SF6 inventory, acquisitions of SF6, and nameplate capacity of GIS devices.
- The California Air Resources Board (“ARB”) should allow sufficient time for utilities to gather and prepare their SF6 records for inspection, and should allow for records to be stored electronically off-site.

II. SYSTEM NAMEPLATE CAPACITY SHOULD BE CALCULATED ON A MONTHLY BASIS RATHER THAN A DAILY BASIS.

Section 95356(e) of the SF6 Regulation requires the average system nameplate capacity to be calculated using the number of days each piece of GIS equipment was in service throughout the year. There may be many changes to GIS equipment during the year, particularly in the case of large utilities with hundreds of pieces of GIS equipment. Many pieces of GIS equipment may be removed from service during the year for repair, replaced by a spare piece of equipment, and then placed back into service at a later time.

Tracking the number of days each piece of equipment was in active service during the year is far beyond current industry practice.

This requirement would be administratively burdensome, and would increase the time, cost and effort required for recordkeeping and to calculate the annual emissions rate.

For example, a large utility with over 500 pieces of GIS equipment would have to track and multiply the nameplate capacity and days in active service of each individual piece of

equipment, then calculate the average each year. The hours of labor to accomplish this alone could far exceed the amounts per year estimated in the Initial Statement of Reasons for the SF6 Regulation for recordkeeping and reporting.

Importantly, the requirement for accuracy down to single days would significantly increase the potential for inadvertent errors. If such errors are found to have occurred, for example in an ARB audit, the errors may not substantially affect the emissions rate but would nevertheless expose the utility to daily penalties for inaccurate reporting under section 95358(b).

Furthermore, each large utility will have to prepare two separate SF6 reports each year – one report for the ARB and one for the US Environmental Protection Agency, each with different standards and requirements. Given this situation, it is important to reduce the administrative burden of SF6 reporting wherever possible, particularly where the requested changes will have little effect on the accuracy of the reports.

Rather than have calculations that are specific down to a single day, SCPPA recommends that the calculation be based on the number of months in the year that each piece of GIS equipment was in active service. This would make very little difference to the accuracy of the average system nameplate capacity while significantly reducing the record-keeping and reporting burden and potential for error. This system can be implemented efficiently using existing systems and processes, without time-consuming changes to current SF6 management procedures.

This change can be reflected in the SF6 Regulation by replacing d_i with m_i in the formula in section 95356(e), and changing the definition of d_i as follows:

m_i = The number of monthsdays during the year the GIS device was in active service

III. JOINT OWNERSHIP OF GIS EQUIPMENT NEEDS TO BE ADDRESSED IN EMISSIONS CALCULATIONS.

Transmission and distribution facilities, GIS equipment and gas containers may be jointly owned. However, section 95356 of the SF6 Regulation does not address how to account for jointly owned equipment in the annual report. The SF6 Regulation needs to specify how jointly-owned equipment should be divided among and reported by the individual owners.

A utility's SF6 inventory would presumably list every piece of SF6 equipment owned by that utility, even if that utility only has a partial ownership share. The result would be that each piece of jointly-owned equipment would be listed in the inventories of several utilities. This is not necessarily problematic. The issue arises when each utility is calculating its annual SF6 emissions and its average system nameplate capacity, for the purposes of calculating its emissions rate. The regulation needs to clarify that when a utility is calculating its decrease in SF6 inventory (for example), its ownership share of each piece of equipment that has been added or removed is taken into account. Likewise when calculating the nameplate capacity of the GIS devices, the regulation needs to specify that the capacity is to be multiplied by the ownership percentage. Otherwise, total SF6 emissions will not reflect each utility's actual position and the emissions will be greatly overstated.

The ownership-share approach is not evident in the current wording of sections 95356(d) and (e). In fact the ownership-share approach, while reasonable and logical, could be interpreted as a breach of the regulation as it involves an additional calculation to which the regulation does not refer.

If the ownership-share clarification is not included, it would be difficult for a utility with jointly-owned equipment to interpret the SF6 Regulation in a way that leads to reasonable results.

Therefore it is important to add a provision to the SF6 Regulation requiring ownership-share percentages to be used in relation to jointly-owned equipment.

SCPPA suggests that the following paragraph be added at the end of section 95356 of the SF6 Regulation:

(f) Joint ownership. Where GIS equipment or gas containers are jointly owned by two or more GIS owners, each joint owner must apply only its percentage equity share (ownership or entitlement share) of the relevant GIS equipment or gas container when calculating annual SF6 emissions under subsection (d) and average system nameplate capacity under subsection (e).

IV. PRACTICAL CHANGES TO RECORDKEEPING REQUIREMENTS ARE NEEDED.

A. Electronic records and jointly-owned records should be addressed.

The SF6 Regulation should accommodate instances where electronic storage of documents is done off-site and even out-of-state by the GIS Owner (or the operator of the GIS equipment, if the owner delegates recordkeeping responsibility to the operator).

SCPPA suggests that the following paragraph be added to section 95355(d) of the SF6 Regulation:

(3) GIS owners may retain records outside of California if such records are electronically stored or jointly owned in the normal course of business.

B. Sufficient time is needed to prepare records for inspections.

While SCPPA has no objection to ARB inspections, GIS owners should be given sufficient time to collect the records and prepare them for inspection. Records may need to be extracted from a central database, or obtained from the operator in cases where the owner and the operator are different entities.

SCPPA suggests that the following phrase be added to section 95355(e) of the SF6 Regulation:

(e) Have all records available for ARB inspection at time of inspection, provided that the ARB gives 15 business days' advance notice of inspection; and ...

V. **CONCLUSION**

SCPPA urges the ARB to consider these comments when it is finalizing the changes to the SF6 Regulation. SCPPA appreciates the opportunity to submit these comments to the ARB.

Respectfully submitted,

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