December 20CMUS iths@braunlegal.comr resposment of local communitiesr actual emissions. sfits exposure from t of those customers ir resposJanlsdkfjjjjfdslkfj, 2017

Mary Nichols, Chair

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**Re:** **Modesto Irrigation District’s Comments on Sulfur Hexafluoride (SF6) Emission Reductions from Gas Insulated Switchgear**

Dear Chairwoman Nichols:

The Modesto Irrigation District (MID) appreciates the opportunity to submit its comments to the California Air Resources Board (ARB) regarding the proposed changes to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear, posted by ARB on November 17, 2017. MID supports the inclusion of a nameplate adjustment procedure to account for the insufficient accuracy of the manufacturer’s nameplate for regulatory reporting purposes, but opposes or requests clarification of several proposed additions that could impose significant cost burden on utilities if implemented. MID is a participant of the SF6 Coalition and is signatory to the comments submitted by that group.

**MID opposes the proposed sulfur hexafluoride phase-out.** MID is concerned that a clear path from the current paradigm of SF6 as the primary, most effective insulating medium to one or many alternative mediums does not exist. MID has evaluated alternative, SF6-free devices with low voltage ratings, but has not found viable alternatives for high voltage applications. Setting a phase-out requirement to an arbitrary time, of 2025 as proposed by ARB in Section 95352.1 of the posted proposed regulation changes, will create the following risks to regulated entities: 1) regulated entities may be subject to enforcement action that they are unable to avoid because the equipment manufacturing market has failed to develop alternative products to SF6 insulated equipment; 2) newly developed alternative products may not have had the time to be properly vetted for safe, reliable operation; 3) SF6 is a high-performing arc quenching medium which could mean alternative devices may be physically larger and thus not adhere to current placement constraints; and 4) utilities with large quantities of gas-insulated equipment have long service lives (approximately thirty years) and alternating maintenance schedules, so the cost of replacing this equipment in a relatively short timeframe would have significant cost impacts to electric service customers. This last point would also result in additional outages since utilities would likely need to take equipment out of service sooner and more frequently than normal to complete all of the replacements.

**MID generally supports the nameplate capacity adjustment procedure proposed in the new Section 95354.1.** MID is pleased that the ARB recognizes the fact that manufacturers of gas-insulated equipment (GIE) did not intend for nameplate gas capacity to be accurate enough for regulatory calculations. The ability to make a one-time nameplate capacity adjustment for GIE will be an invaluable tool for ensuring an accurate count of real SF6 emissions, rather than “phantom emissions” arising from calculated discrepancies between nameplate and actual capacity. MID supports the procedure offered by ARB for measuring the actual insulating gas capacity for GIE. However, MID requests the following changes:

1. **Remove the requirement that nameplate capacity adjustment take place prior to 2023.** The issue of an inaccurate nameplate only manifests in the SF6 emissions calculation when GIE is added or removed from active service, which occurs on a regular schedule in order to maintain electric reliability. To remove each piece of GIE from active service to complete the nameplate capacity adjustment procedure would be an onerous process for reporters and could cost electric customers money and unnecessary outages.
2. **Allow nameplate capacity adjustment for equipment manufactured after 2011.** Some currently active GIE has been manufactured after 2011 and may also have inaccurate nameplate capacities. There is no evidence to indicate that, from 2011 on, GIE manufacturers have eliminated or dramatically reduced nameplate tolerances or can guarantee accuracy for all GIE. Until a universal standard for nameplate capacity is implemented and shown to be possible, it is prudent to allow nameplate capacity adjustment for all GIE, regardless of manufacturing date.
3. **Rethink the 60 day advanced reporting requirement prior to performing the nameplate capacity adjustment procedure.** It is unclear what benefit to ARB or emissions integrity that this requirement provides. MID suggests that notice of the procedure be provided to ARB with no time requirement, since this would allow for GIE that is taken out of service unexpectedly to have its nameplate capacity adjusted without taking an additional outage at another time. ARB would still have 30 days to review the adjustment pursuant to Section 95354.1(j.).

**MID requests clarity regarding the credit provided for using zero GWP technology.** The proposed regulatory amendments adds a credit for using zero GWP technology by allowing a value of one pound for every 1,000 volts to the calculation of adjusted system nameplate capacity for zero-emitting equipment. The genesis of the one pound per 1,000 volts is unclear. MID requests that ARB provide more detail regarding the origin of the one pound per 1,000 volt credit and be open to dialogue regarding alternative methods of recognizing reporting entities’ investments in clean technology. One such alternative is to relate the cost of switching to zero GWP equipment versus existing available equipment.

Thank you for your consideration of our comments on these important issues.

Sincerely



Gary Soiseth

Regulatory Administrator

Modesto Irrigation District

1231 11th Street

Modesto, CA 95354