September 24, 2020

Ms. Mary Jane Coombs
Manager, Program Development Section
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear Ms. Coombs:

Subject: Additional Comment on the Proposed Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear (45-Day comment period)

The Los Angeles Department of Water and Power (LADWP) respectfully submits this additional comment to the California Air Resources Board (CARB) on the *Proposed Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear* (Proposed Amendments).

After reading the comment letter that GE Grid Solutions submitted into the rulemaking docket, LADWP recognizes that GE brings up a good point -- that development of SF6-free gas-insulated equipment (GIE) using alternative gases may be discouraged if alternative gases are less desirable because they are subject to the regulation recordkeeping and reporting burden. This may be an unintentional impact of the proposed amendments.

The proposed amended regulation will apply to owners of GIE that uses a "covered insulating gas", which is defined as an insulating gas with a Global Warming Potential (GWP) greater than one (GWP > 1). This includes gas mixtures with GWP > 1, that appear to be a suitable substitute for SF6 for higher voltage and higher short-circuit current applications.

As a buyer of GIE, LADWP desires to have a broad range of SF6-free product options to choose from. LADWP supports the open-market technological advancement of SF6-free GIE for a broad range of applications. Having an open-market condition for development of SF6-free GIE technology is critical, especially since the current evidence indicates that GIE technologies with GWP less than or equal to one (GWP $\leq$ 1) will have enormous challenges to meet the requirements of particular applications such as high voltage shunt capacitor and reactor switching and protection. In addition, it appears that SF6-free GIE technologies with GWP $\leq$ 1 will have difficulty meeting high short-circuit current ratings as well as high voltage ratings. Based on the evidence available today, it appears vacuum technology will not be able to meet the needs for these particular applications.

LADWP encourages CARB to consider raising the applicability threshold for covered insulating gases to a GWP of 500. A higher threshold will avoid putting technologies that use a gas mixture at a disadvantage, and allow development of SF6-free GIE in an open-market condition.

More SF6-free GIE choices will facilitate CARB's goal to phase out the use of SF6, and reduce the likelihood of needing SF6 phase out exemptions for the higher voltage and higher short-circuit current applications.

Thank you for your consideration of these comments. If you have any questions, please contact Ms. Andrea Villarin at (213) 367-0409 or Ms. Cindy Parsons at (213) 367-0636.

Sincerely,

Katherine Rubin
Manager of Environmental Rulemaking and Compliance

CP: gn
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