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**RE: August 15, 2019 DISCUSSION DRAFT of Potential Changes to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear.**

San Diego Gas and Electric Company (SDG&E) appreciates the ongoing work of the California Air Resources Board (CARB) to offer a reasonable revision to the Regulation for Reducing Sulfur Hexafluoride (SF6) Emissions from Gas Insulated Switchgear. With a Global Warming Potential (GWP) of 22,800 relative to CO2, reduction of SF6 usage and emissions represents a good opportunity to reduce California’s overall Greenhouse Gas (GHG) emissions.

We are concerned that the current draft legislation does not take into account all available technology, specifically achieving cost, ratings and performance equivalent to existing SF6 circuit breaker GIE. Specifically, the latest draft mandates emissions tracking and reporting of any GIE using any gas with GWP >1. We believe that this places a restriction on user adoption of alternative technologies as well as a possible deterrent to development of GIE particularly higher voltage and short circuit ratings.

SDG&E therefore requests that CARB revise the reporting threshold to GWP ≥ 500. We strongly believe that this will ensure SF6-free development and adoption while at the same time offering a dramatic reduction in GHG usage for high voltage GIE.

Thank you in advance for your consideration.

Respectfully,

Brian Yim

Senior Environmental Specialist

San Diego Gas and Electric Company