

Nuventura GmbH | Jablonskistr. 21 | 10405 Berlin

Mary Jane Coombs,
Director,
California Air Resource Board,
1001 I Street, Sacramento, California 95814.

Dear Ms Coombs,

I am writing to inform you that Nuventura GmbH supports California's regulation to phase out the purchases of SF6 equipment, from the MV power grid, by 2025. Nuventura has developed a dry-air, MV (36 kV) GIS which will be ready by 2020, and we will have a full MV portfolio by 2025.

In light of the recent public workshop on 'Regulation for Reducing Sulfur Hexafluoride (SF6) Emissions from Gas Insulated Switchgear', it was brought to our attention that it has been suggested that the CARB phase out date for GIE technologies above 17.5 kV should be delayed until 1/1/2031.

We would like to make it clear that competitive SF6-free switchgear solutions exist above 17.5 kV which make redundant the use of SF6 and, therefore, see no reason for the delayed implementation of the phase out until after 1/1/2025.

Examples of such technologies, other than traditional AIS and Nuventura's 36 kV dry-air GIS, include [Efacec's](#) 24kV Solid Insulated Switchgear (SIS), [Eaton's](#) 24 kV MV SIS range, [Schneider's](#) 24kV dry-air range as well as [Hyosung's](#) and [Huade High-Tech's](#) MV dry-air offerings.

We hope that these examples not only demonstrate that competitive SF6-free alternatives for the MV range will be readily available by 2025, but also that the regulatory environment is having the desired effect of encouraging the sustainable innovation required to move away from SF6-GIS. CARB's 2025 phase out date has been a contributing factor to this, and we fear that any changes would take the proverbial wind out of the sails of SF6-free GIE innovation, and even encourage manufacturers to slow down their innovation activities.

Sincerely,

Fabian Lemke

Managing Director