



Transmission Agency of Northern California
P.O. Box 15129, Sacramento, CA 95851-0129 (916) 852-1673

December 19, 2017

Mr. David Mehl
SF6 Regulatory Coordinator
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Subject: Transmission Agency of Northern California (TANC) Comments Regarding Proposed Revisions to Subarticle 3.1, Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear sections 95350 to 95359, title 17, California Code of Regulations

Dear Mr. Mehl:

The Transmission Agency of Northern California (TANC) appreciates the opportunity to submit these initial comments regarding the proposed regulatory changes. TANC is a joint powers agency that includes 15 publicly-owned municipal utilities. TANC's planned, designed and constructed the California-Oregon Transmission Project; a 340-mile long, 500-kV transmission line between the California-Oregon border and Central California. TANC is the project manager for the COTP. The Western Area Power Administration (WAPA) provides COTP operation and maintenance services under contract to TANC. These services include the management and handling of TANC-owned circuit breakers. WAPA has provided comments regarding these proposed changes separately.

We understand that the proposed changes expand the scope of the regulation order beyond sulfur hexafluoride (SF₆) to include a range of insulating gases with global warming potential and the equipment used to handle them. We also understand that one intent of the proposed changes is to phase out the installation or conversion of SF₆ equipment after January 1, 2025.

TANC shares the concerns expressed by WAPA regarding the need for a transparent process that is informed by the best available information regarding the technical feasibility, costs, and overall availability of alternative gases and equipment that will be considered for achieving the scope of the proposed changes.

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At this initial stage, TANC believes that CARB should frame the regulatory process for making these changes with the intent that it be fully informed in three key areas, as follows:

Technical Feasibility – As CARB moves forward towards ultimately replacing SF₆ and the associated switchgear equipment, every effort should be made to understand the technical feasibility of alternative gases and equipment to provide an equivalent level of operational efficiency and reliability as the current state-of-the-art SF₆ technology as informed by those managing such operations and maintenance activities on a day-to-day basis, and the research community.

Cost – The cost analyses for alternative gases and equipment should be a robust and fully informed comparison of all direct and indirect costs associated with the phased replacement of existing equipment with accepted alternative technologies. Manufacturers of such equipment should be involved to ensure that the ongoing “1%” maximum annual emission rate required for compliance can be achieved routinely without costly or extraordinary operations and/or maintenance practices.

Outreach and Transparency – We appreciate that the CARB webinar presented on November 28, 2017 emphasized CARB’s intent to conduct a very transparent process with several opportunities to comment as the process moves forward. We urge CARB to also reach far and wide across industries, states, research institutions, and other sources of information regarding the lessons learned and successful approaches that have been adopted by others striving to reduce greenhouse gases in the same and similar industrial and utility applications.

TANC understands the importance that California is placing on complying with AB 32, SB 32, and AB 197 towards reducing greenhouse gas emissions. We look forward to the opportunity to provide additional comments during CARB’s stakeholder process on this subject matter.

Sincerely,

Shawn Matchim
Assistant General Manager