



July 1, 2021

Ms. Carey Bylin
Manager, Energy Section
Industrial Strategies Division
California Air Resources Board
1001 I Street, Sacramento, CA 95814

RE: SCE Comments Regarding the Second 15-Day Text Proposed Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear

Dear Ms. Bylin,

Southern California Edison (“SCE”) appreciates the opportunity to comment on the California Air Resources Board’s (“CARB”) Proposed Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear (“Proposed Amendments”) released June 17, 2021.

SCE appreciates the dedication of the CARB Staff over the past several years to learn and understand the unique challenges of the individual utilities and the manufacturers producing gas insulated equipment (GIE). We recognize the substantial effort CARB Staff have taken to work with stakeholders to address specific concerns and develop a regulation that will reduce GHG emissions and be achievable and cost-effective while preserving safety and reliability in the electricity grid. The Proposed Amendments in the 15-Day text continue to build a more feasible regulation. SCE requests clarifications or guidance on certain regulation sections mentioned in this letter, either through the FSOR process or published FAQs.

I. Provide clarification around timelines related to ‘Removed from Regular Use.’

Section 95354(d) specifies that covered insulating gas must be removed from a GIE within one year of the GIE device being classified as “removed from regular use”. SCE would find it useful if CARB staff can provide additional guidance regarding the timeline when the one-year clock begins.

In most instances, when SCE’s distribution assets (<38 kV) are removed in the field, the field operators removing the switches are unable to determine if the switch will require disposal, or if the switch is in a condition to be reused (perhaps after repairs). This determination is made by a separate organization within SCE, once they receive the switch from the field. Thus, the determination of whether to recondition a switch and keep it in storage or to dispose of it is made at a later date, not at the moment when a GIE device is removed in the field. Based on operational data, this might take anywhere from a few weeks to six months depending on the scope of the job.

Based on our reading of 95354(C)(1), we understand that the one-year clock would start at the moment when the determination is made to dispose of the switch, which can occur after its removal. Until that

determination, the GIE device would be considered to be in storage. We believe this interpretation complies with section 95354, as long as unit does not stay in storage longer than five consecutive years and gas is removed within one year after the determination has been made to remove the GIE from SCE's inventory.

A confirmation of our understanding in the FSOR or any guidance would be appreciated.

II. Confirm understanding around procedures for measuring covered insulating gas being removed from GIE.

Section 95354(d)(1) states: "Weigh the gas container being used to receive the covered insulating gas from the device prior to, and after, recovery of the covered insulating gas from the GIE device following the requirements of section 95354(e), and subtract the first value (prior-to-transfer gas container weight) from the second value (after-transfer gas container weight)."

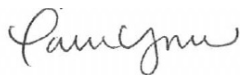
SCE would like to bring to CARB staff's attention the existence of gas carts with manifolds that allow the removal of gas from multiple GIEs at the same time. All GIE devices connected to the gas cart would simultaneously empty the gas into one common cylinder/ container. Under the proposed language, it is unclear whether the amount of gas must be weighed and recorded separately for each GIE, or whether it is acceptable to transfer gas from multiple GIEs to one common cylinder simultaneously. The cylinder would still be weighed before and afterward, and the GIE devices will each be weighed before and afterward to determine the gas removed from each GIE device.

A clarification provided in the FSOR or subsequent guidance documents will be helpful to ensure acceptable procedures are used consistently across all utilities.

Conclusion

SCE thanks CARB for the collaboration and opportunity to provide comments on the second 15-Day Text Proposed Amendments. We look forward to implementing the revised regulation while maintaining safety and reliability in the electricity grid.

Respectfully,



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