



Department of Energy
Western Area Power Administration
Sierra Nevada Customer Service Region
114 Parkshore Drive
Folsom, California 95630-4710

MAR 22 2018

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

Dear Mr. Mehl:

The Western Area Power Administration (WAPA), an agency of the United States Department of Energy appreciates the opportunity to submit additional comments on the November 28, 2017 'Strawman Version' of potential SF6 Regulation changes. As stated in our first comment letter, WAPA remains committed to honoring its environmental stewardship responsibilities. While there are jurisdictional questions regarding the application of California Air Resources Board's (CARB) SF6 emission reduction programs to the federal government, to avoid a dispute, WAPA voluntarily complies with CARB's SF6 emission reduction program. As part of our continued voluntary compliance, WAPA submits these additional comments and questions for your consideration.

We concur with the points made in the second Joint Utilities Group (Utilities Group) letter which was sent to you earlier in March. To remain consistent we have chosen to submit comments independent of the Utilities Group to address the following sections:

- Purpose, Scope, and Applicability (§ 95350)
- Sulfur Hexafluoride Phase Out (§ 95352.1)
- Nameplate Capacity Adjustments (§ 95354.1)
- Annual Reporting Requirements, Annual Emission Rate (§ 95356(e))

I. § 95350 - Purpose, Scope, and Applicability

WAPA supports a coordinated effort among CARB, utilities, manufacturers, and their respective associations to work toward the reduction of high global warming potential emissions from SF6.

WAPA is in support of the Utilities Group proposed de minimis threshold for exemption for utilities with nameplate capacity below 10,000 MT CO₂e, or some other agreed upon threshold. We work closely with several small utilities with small gas insulated equipment (GIE) inventories whom could be greatly impacted by the capital cost of replacements with SF6 alternatives particularly as the cost of alternatives are expected to be greater than SF6 GIE. In addition, inclusion of a de minimis threshold in the regulation would provide larger utilities incentive for successful replacement of SF6 GIE with alternatives to achieve the de minimis level.

II. § 95352.1 – Sulfur Hexafluoride Phase Out

WAPA supports the Utilities Group proposal to phase out the purchase of SF6 GIE by voltage class under a tiered schedule that is dependent upon commercial availability and assurances for safety, reliability, and cost effectiveness. We are currently working to evaluate our GIE inventory and look forward to discussing the topic at forthcoming public workshops.

Our primary concerns remain that 1) it is difficult to determine the technical feasibility of complying with a phase out date without having the opportunity to evaluate technical data from local California-based installations; and 2) we want to be sure when the time comes, that we are investing our customer-based funds prudently in tried and true technology that will be dependable and enduring.

III. Add section ‘§95353.2 Technical Infeasibility Exemption

WAPA supports the Utilities Group proposal to include a technical infeasibility exemption option in the regulation. WAPA transmission depends upon high voltage 230kV and 500kV GIE for which there may or may not be feasible alternatives available upon reaching the effective phase out date. The technical infeasibility exemption ensures the continued safe and reliable operation of the statewide electricity grid should SF6 alternatives not be commercially available, or are cost prohibitive.

IV. § 95354.1 - Nameplate Capacity Adjustments

WAPA supports the Utilities Group proposal for nameplate capacity adjustment to be allowed within 40 years from the manufacture date using identified industry standards and to request CARB provide separate guidance for adjustment methodology rather than being included in the regulation. Additionally, we request CARB consider requiring nameplate accuracy by manufacturers for all new GIE sold within the state of California beginning in 2020.

V. § 95356 - Annual Reporting Requirements

WAPA supports the Utilities Group proposal to utilize an alternative calculation which credits emissions reductions (by granting more flexibility with the remaining equipment) resulting from the use of alternative or zero GWP gases. In addition to supporting that equation, WAPA supports the creation of an optional SF6 emissions calculator to assist reporting entities with reporting requirements.

We appreciate this opportunity to provide you with our comments. Should you have any comments and/or concerns, please do not hesitate to contact me at (916) 353-4032 or at GRobbins@wapa.gov

Sincerely,



Gerald Robbins
Environmental Manager