



Energy Section Manager  
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 California Air Resources Board  
 P.O. Box 2815, Sacramento, CA 95812

Date: August 29, 2019  
 Subject: Comments about the "August 15, 2019 DISCUSSION DRAFT of Potential Changes to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear"

G&W thanks CARB for the opportunity to review and respond to the August 2019 Discussion Draft of the regulation. In addition, G&W is appreciative of the time and effort that CARB staff has expended in reviewing previous comments and drafting the current document.

Section 95352 has been revised to increase the gradients and allow for different applications and equipment ratings. The new tables allow the opportunity for the phase-out dates to reflect the variances in the industry and the complexities in developing alternatives for SF<sub>6</sub> GIE. As a manufacturer, G&W recommends the following phase-out date changes for Table 1 to allow for manufacturer development and testing time and user approval of new technologies:

Configuration	Voltage (kV)	Short-circuit Current (kA)	Phase-out Date	G&W Proposal
Aboveground	< 38	< 25	January 1, 2025	January 1, 2025
		≥ 25	January 1, 2025	January 1, 2025
	≥ 38	< 25	January 1, 2025	January 1, 2031
		≥ 25	January 1, 2025	January 1, 2031
Belowground	< 38	< 25	January 1, 2025	January 1, 2031
		≥ 25	January 1, 2025	January 1, 2031
	≥ 38	< 25	January 1, 2025	January 1, 2031
		≥ 25	January 1, 2025	January 1, 2031

Section 95355.3 includes a proposal for a Clearinghouse to aid GIE owners in identifying available alternatives that meet their needs. While G&W agrees with the concept, there are several items which we believe must be considered in the creation and maintenance of such a database. These items include: a preference for a single clearinghouse and therefore access for all users of GIE (regardless of location), a common format for information upload and a list of standard options/selections for OEMS (example: use of applicable Standard numbers to define the equipment type), an information validity date, and method for review and flagging of incorrect/incomplete information. We recommend that CARB use NEMA's Electric Transmission & Distribution SF<sub>6</sub> Coalition as a facilitator for discussions with the GIE manufacturers on this topic.

We welcome questions and discussion on these comments,

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