



Cogentrix Energy Power Management, LLC

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March 11, 2019

Mary Jane Coombs
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Draft Amendments to the Regulation for Reducing Sulfur Hexafluoride (SF₆) Emissions from Gas Insulated Switchgear

Dear Ms. Mary Jane Coombs,

Cogentrix Energy Power Management, LLC ("Cogentrix") respectfully submits comments to the Draft Amendments to the Regulation for Reducing Sulfur Hexafluoride (SF₆) Emissions from Gas Insulated Switchgear released on February 22, 2019.

Cogentrix affiliates own and Cogentrix operates approximately 7,200 MW of electric generation facilities throughout the United States, including six efficient fast-start natural gas fired facilities that directly contribute ~416 MW to the reliability of California's bulk power system. Cogentrix has participated in competitive wholesale markets in most of the major power regions in the U.S., including CAISO.

In reviewing the Draft Amendments to the SF₆ regulations, Cogentrix has concerns related to the feasibility and economic impact of the proposed SF₆ GIE phase out and the tighter emission rate limits as a percentage of average nameplate capacity. While Cogentrix understands the importance of reducing potent Greenhouse Gases (GHG) like SF₆, the feasibility and economic impact to independent power producers (IPPs) of increasing already stringent regulations should be considered.

First, with respect to the proposed phase out of SF₆ GIE, this may not be technically feasible for all power plants. The technical infeasibility exemption process allows for the possibility, but not the

guarantee, of an exception. As such, for those generation facilities where it is not technically or economically feasible to replace SF₆ GIE technology, failure to receive an exception could result in retirement or mothballing of in-state resources that are critical for reliability.

Second, with respect to the proposed tighter emissions rate limits that would decrease from 1 percent in 2020 to 0.6 percent in 2049, this seems disproportionately punitive to IPPs who own and operate in-state generation portfolios with significantly lower SF₆ inventory than their utility counterparts. Similar to the SF₆ GIE phase out, tighter emissions rate limits may result in premature retirements or mothballing of in-state resources needed for reliability.

Cogentrix encourages CARB to carry out a detailed study to better understand the impacts of the proposed regulation changes to a wide variety of generators including IPPs. Additionally, Cogentrix encourages CARB to explore alternative regulations for achieving the stated policy goal of further reducing GHG emissions to ensure that the proposed is the most efficient and effective approach to reducing GHG emissions in the bulk power system while maintaining critical reliability.

Sincerely,

Julie McLaughlin

Vice President Commercial Origination

Cogentrix Energy Power Management, LLC