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California Air Resources Board

Dear California Air Resources Board Members,

San Diego Gas and Electric Company (“SDG&E”) appreciates the ability to offer comments 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 on July 21, 2020.

SDG&E supports the Joint Utilities Group letter to CARB, dated September 22, 2020, and in this letter we emphasize specific subsections within the Proposed Amendments.

Section 95351 of the Proposed Amendments defines a “Covered Insulating Gas” as an insulating gas with a global warming potential (GWP) greater than one. SDG&E requests that “Covered Insulating Gas” GWP should be increased to greater than 500. This increase will encourage technology advancement in the higher voltage levels 230 kV and greater.

Section 95356 of the Proposed Amendments, particularly subsection (a)(4), requires onerous procurement recordkeeping which does not provide added value to the overall achievement of reducing SF6 emissions. We propose the following language change:

**AMEND** §95356(a)(4). Documentation regarding the purchase and acquisition of any covered insulating gas and/or gas insulated equipment (GIE) ~~(including but not limited to, contracts, material invoices, and receipts)~~, including any information used to justify the acquisition of SF6 GIE after the phase-out date pursuant to section 95352(a)(2)-(4);

Section 95357 of the Proposed Amendments implements a phase-out schedule for SF6 circuit breakers and other GIE beginning with the year 2025. As stated in previous SDG&E letters, it is imperative that the Proposed Amendments are aligned with the availability of commercially manufactured and utility tested SF6 alternative GIE, to ensure SDG&E’s electric grid can be operated in a safe, reliable, and cost-effective manner.

Until new (tested and certified) SF6 alternative GIEs are made available, it is critical that existing SF6 GIE and spare SF6 GIE be preserved for use to safely and reliably operate the electric grid. The incorporation of

new SF6 alternative GIE into existing facilities may require significant changes (i.e., footprint and configuration within a substation), which will subsequently require adequate time to permit and construct. Lastly, the costs associated with the transition to non-SF6 GIE will be paid by SDG&E's customers, so it is vitally important that the Proposed Regulations strike a realistic balance between the phase-out schedule and multilayered requirements to implement such SF6 alternative GIE.

SDG&E should be able to purchase spare SF6 GIE for emergency replacement. SDG&E keeps spare SF6 gas circuit breakers for equipment failures and should be able to replace the spares when these are used for GIE failure replacement. SDG&E has had three such replacements in the last five years. These spares could be designated for failed equipment replacements, and not new installations.

Section 95359 of the Proposed Amendments introduces enforcement actions which are unnecessary and overly punitive, as even a minor error could result in multiple violations and exorbitant fines. The new proposal within this section separates out similar errors into multiple violation categories. This has a multiplier effect that could create excessive penalty amounts. These changes are counterproductive and will not serve CARB, or the regulated community, in implementation. For example, utilities within the Joint Utilities Group have experienced several situations where a serial number or voltage was recorded incorrectly. These types of corrections do not have a significant, if any, impact on the emissions and should not result in a violation. The existing rule provisions provide clear authority for CARB to enforce any violations of the rule—be they emissions, reporting, or recordkeeping.

SDG&E respectfully requests that the CARB Board direct CARB staff to continue to work with stakeholders on outstanding concerns and make necessary changes in a 15-day change package.

Should you have any questions please contact me at (619) 676-8635 or via email: [byim@sdge.com](mailto:byim@sdge.com).

Thank you very much.

Sincerely,  
Brian Yim  
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