



February 12, 2010

NEMA COMMENTS TO THE CALIFORNIA AIR RESOURCES BOARD
PROPOSED UTILITY SF6 GAS REGULATIONS

The NEMA SF6 Task Group (“Task Group”) is pleased to submit these comments on the proposed regulatory language for the gas insulated switchgear (GIS) subarticle within the regulations to achieve greenhouse gas emissions reductions. The Task Group represents original equipment manufacturers (OEMs) of electrical equipment which utilizes SF6, as well as producers and distributors of the gas. The Task Group recognizes that SF6 is a potent greenhouse gas, and that technologies to reduce SF6 emissions from the electric power sector are readily available. Since 1998, the Task Group has led voluntary efforts to reduce SF6 emissions through data collection, operational practices, and collaboration between government and industry. This document contains specific suggestions on the proposed language.

1. Definition of “GIS Owner” and Equipment Transfer

The definition of “GIS Owner” is adequate as currently written.

2. Definition of “Hermetically Sealed”

As currently written, the definition of hermetically sealed is open to interpretation. In the absence of additional exclusions, (i.e. pre-charged with gas, sealed at the factory, and not user-refillable) this definition could be interpreted to cover a broad range of switchgear models. If the intent of the ARB is to narrow the scope of the exemption for hermetically sealed devices, NEMA would recommend a more precise definition. The ARB may consider including the additional exclusions as described above.

Thank you for the opportunity to comment. If you have any questions about this submission, please contact Eric Hsieh (eric.hsieh@nema.org), NEMA Government Relations Manager and coordinator for the NEMA SF6 Task Group.

Sincerely,



Kyle Pitsor