I offer the following comments on the subject regulation under review.

President Biden has returned the USA to the Paris Climate Accord and in doing so adopted its guidance to reach a "peak inventory" of Global Warming Potential (GWP) gases by 2030 and then to reduce that inventory and emissions of the GWP gases into the atmosphere.

The CA regulation could support this federal mandate by not only "Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear" but by capping our GWP gases in 2030 while working to reduce our GWP gases emissions.  In the past CA has measured our GWP gases emissions as a percent of inventory.  While we allowed GWP gases users to recklessly increase their GWP gases inventory.  For the last 20 years there have been zero GWP alternatives that could have substituted for GWP gases, reducing our inventory.

Because in the past we have not used available zero GWP alternative gases we have grown our GWP gases inventory, increased our GWP gases emissions while decreasing our annual percentage of inventory emissions.  Percentage of inventory emissions is an incorrect indicator until the "Peak inventory" is established.

President Biden and the Paris Climate Agreement has moved our thinking away from "efficient use" of GWP gases to the "elimination of use "of GWP gases.

Example:  The new Ford F150  (that Biden drove the other day) does not have improved efficiency to reduce the GWP gases emissions.  Instead, the truck “eliminates the use” of GWP producing fuels.  Its electric motor eliminated its gasoline motor.  We need to take our regulation on SF6 to that level.

We can do this by taking the following steps:

1. Phase out the procurement of new SF6 gases in CA by the end of 2030 (with the limited exceptions for technically justified cases). Starting at the end of 2021, require all Gas insulated Switchgear to have a design leak-rate of less than 0.3%. This design leak-rate should be typed tested by a certified independent third party and validated thru post installation field testing.

(Presently there are at least three suppliers that have switchgear that have equipment that has a leak-rate as low as 0.1% and offer a 30 year warranty on the 0.1% leak-rate. Utilities in CA are presently purchasing equipment with leak-rates that exceed 2%)

1. Require use of ZERO GWP alternatives in a phase-in approach that aligns with the 2030 phase-out of all GWP gases. (There are currently three vendors that offer zero GWP alternatives.)
2. Require 100% recycle of GWP gases (such as SF6) starting at the end of 2021. (presently all major equipment manufacturers allow for the use of recycled SF6 in their equipment.
3. Each major user of a GWP gas (like SF6) should have a road map to reach a peak inventory prior to 2030 and then have a working plan to reduce their inventory to their 2000 level by 2050.
4. The maximum allowable inventory leak-rate should be 0.5%.  The same level that IEEE has recommended for the last 10 years.  (The current 1.0% leak-rate is too high when major equipment manufacturers are warranting equipment for 30 years at a 0.1% leakage rate.)

Thank you for your time and interest in this change.  We are no longer working to make our use of the GWP gases more "efficient" we are working to "eliminate" the use of all human-made GWP gases.  SF6 is the for-ever-GWP gas, it is not a gas that exists in nature, it is only made by humans and lasts in our earth's atmosphere for 3,200 years.

Thank you