

May 26, 2021

California Air Resources Board
1001 I Street
Sacramento, California 95814

Electronic Submittal, <https://ww2.arb.ca.gov/rulemaking/2020/sf6>

Joint statement by Hitachi ABB Power Grids, GE Grid Solutions and 3M relating to the California Air Resources Board (CARB) Proposed Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear

The involved companies appreciate the opportunity to comment on CARB's draft regulation to reduce the use of SF₆ in gas-insulated equipment (GIE) and commends CARB on its leadership role in this important endeavor.

We believe CARB's currently contemplated reporting requirement for SF₆-free GIE will lead to a significant disadvantage for alternative gas-blend solutions in California. These gas-blend technologies yield significant carbon reduction benefits and are an important component to the SF₆ phaseout timeline, especially for upper voltage and current ratings as well as special purpose applications.

Numerous stakeholders, including many Californian utilities, recognize this obstacle and support increasing the reporting threshold for gas blends and insulating gases.

Alternative gas-blend solutions are a critical component to the complete SF₆ phase-out roadmap. Increasing the reporting requirement threshold to include all SF₆-free solutions with GWP>1 would put gas-blend solutions on a level-playing field in California with other carbon-reducing market-ready solutions. We believe that excluding the reporting requirement for all SF₆-free solutions will provide California utilities with another highly impactful and effective tool as they reduce and eliminate the use of SF₆.

It is also important to note that gas-blend solutions include a dielectric gas that represents the smallest percent component of the gas mixture compared to the other molecules such as CO₂ and O₂, therefore representing a minor emission risk relative to the blend. We therefore recommend considering the GWP of the gas mixture instead of the GWP of the individual components.

Europe has already facilitated the adoption of all SF₆-free technologies and many European countries are starting to realize the significant environmental benefits from this inclusive approach. We are convinced the change is necessary to give Californian utilities a complete menu of SF₆-free options and to operationalize a successful timely reduction of installation of non-SF₆ GIE at all kV and kA ratings.

We thank you again for your consideration and for the opportunity to contribute to this critical regulation that will far-reaching implications and likely influence the evolution of the SF₆-free North American market.

More details can be found in the individual comments by each of the companies.

