



City of Anaheim  
**PUBLIC UTILITIES DEPARTMENT**  
Environmental and Safety Services

May 26, 2021

Clerk's Office  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Comments on Proposed Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear

Electronic Submittal to <https://www.arb.ca.gov/lispub/comm/bclist.php>

To Whom It May Concern:

The City of Anaheim Public Utilities Department appreciates the opportunity to comment on the California Air Resources Board (CARB) Proposed Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear (Proposed Amendments) dated May 5, 2021. APU appreciates that CARB has included the ability to improve the accuracy of GIE inventories through the use of nameplate capacity adjustments in Section 95357.2 of the Proposed Rule. Generally, this would allow inaccurate nameplates to be corrected by charging the piece of equipment to its design capacity, extracting the insulating gas, and measuring the amount of gas recovered. In addition to this method, APU recommends that CARB consider adding an additional method where the nameplate could be adjusted while adding insulating gas back into the GIE. We recommend that the nameplate capacity adjustment be split into two alternatives in Section 95357.2:

(1) Nameplate Capacity Adjustment While Removing Gas  
Insert 95357.2(c)(1)-(7)

(2) Nameplate Capacity Adjustment While Filling Gas

(A) Remove all insulating gas from the GIE in accordance with manufacturer requirements.

(B) Weigh the gas container being used to supply the gas, record this value, and add insulating gas to the GIE until reaching the temperature-compensated design operating pressure specified by the manufacturer using the procedures in section 95354(b)(1) or 95354(b)(2).

(C) Record the amount of insulating gas added (pounds), either based on the reading from the mass flow meter, or by weighing the gas container that supplied the gas. The amount of gas added shall be the revised nameplate capacity for the GIE device.

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This would simplify the nameplate adjustment process by eliminating the need to adjust the level of insulating gas in the GIE before beginning the gas extraction process if the GIE would be refilled and returned to service.

Thank you for the opportunity to comment on the Proposed Rule. Please feel free to contact me at 714-765-4117 or [jsanks@anaheim.net](mailto:jsanks@anaheim.net) if you have any questions about these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Sanks". The signature is fluid and cursive, with a large initial "J" and "S".

Jonathan Sanks  
Environmental Services and Safety Manager