



The Electric Transmission & Distribution SF₆ Coalition

Position Paper

CARB's Proposed 2011 Manufacturing Cut-Off Date for Nameplate Adjustment

The undersigned coalition of companies, comprised of producers and distributors of SF₆ and SF₆ alternatives, manufacturers of gas-insulated equipment (GIE) and California utilities using GIE, support the California Air Resources Board's (CARB) proposal to allow nameplate adjustment when the manufacturer's nameplate capacity of devices is determined to be imprecise by the GIE owner. Our general support for the concept of nameplate adjustment notwithstanding, we maintain concerns related to the proposed limitation that nameplate adjustment only be allowed on GIE manufactured prior to 2011. Below we offer the reasons for our concern and suggest an alternative approach that represents a fair compromise taking into account market realities.

2011 Is Not a Relevant Date to the GIE Manufacturing Process

2011 is an arbitrary manufacturing cut-off date for nameplate adjustment. It assumes that equipment manufactured that year or later is somehow more likely to have nameplates with greater accuracy simply because that is the year that the SF₆ emissions reporting requirements took place in California. However, this assumption is not correct. None of the GIE manufacturers that are signatories to this paper were ever asked by regulators to increase nameplate accuracy in conjunction with the 2011 effective date. Nor did any of the below GIE manufacturers voluntarily undertake to do so in order to accommodate the emission rate reduction goals of a single market. Indeed, much of the nameplate imprecision is a result of manufacturing tolerances (differences between the precise dimensions of parts and components) that are outside the manufacturers' control. While it is true that the SF₆ emissions reporting regulation took effect in 2011, this fact has little, if any, relevance to the proposed restriction that nameplate adjustment only be allowed on equipment manufactured prior to that date.

2023 is a More Appropriate Date

While we do not agree with the proposed 2011 restriction, we do understand CARB's desire to have a cut-off date to limit the number of nameplate adjustments. Accordingly, we propose that this date be 2023. Our reasons are twofold. First, this is the year that CARB proposes be the deadline for which all nameplate adjustments must occur. While we have suggested a more nuanced approach to this deadline in our corresponding position paper ("CARB's Proposed Deadline for Nameplate Adjustment"), we also support leaving it intact for nameplate adjustment in certain scenarios. We feel that simplifying the regulatory parameters to allow nameplate adjustment up to and only on equipment manufactured prior to 2023 is a good and consistent approach.

In addition to reasons of consistency, we also feel that 2023 is a more appropriate cut-off date for nameplate adjustment because this will allow industry standards for nameplate accuracy requirements to be further developed and implemented by manufacturers. For medium- and high-voltage equipment, these standards are owned and maintained by the Institute of Electrical and Electronics Engineers (IEEE). Because there are several types of GIE and associated voltages, there are several IEEE subcommittees that each need to develop accuracy requirements. Due to established, 10-year, revision cycles (albeit with varying start- and end-dates) some subcommittees have already taken up the issue while others have yet to do so. Establishing a cut-off date of 2023 will give each of these subcommittees time to

discuss and agree to a nameplate accuracy requirement.

Changes to equipment manufacturing procedures are largely driven by the results of the standards development process; once the undersigned GIE manufacturers understand what the accuracy requirements are they will then alter their manufacturing processes to conform (i.e. issue more accurate nameplates). This will ultimately result in a reduced need for nameplate adjustment and greater reporting accuracy.

Parts Replacement

Just as with the 2023 proposed deadline for nameplate adjustment, we feel that a permanent exemption is merited here for equipment maintenance involving parts replacement that has altered the nameplate capacity by a factor of >1%. For further explanation and analysis here, please see our Position Paper entitled *CARB's Proposed Deadline for Nameplate Adjustment*. In sum, the need to replace parts on equipment is unavoidable and unpredictable and when doing so results in a material change in the mass of SF₆ required to fill equipment to the proper density, utilities should be able to adjust the nameplate accordingly and account for this change in the user emission calculation (i.e. Net increase in total nameplate capacity of GIE owned).

We feel that our proposed alternative language offers a fair compromise to meet CARB's desire for a cut-off date while tying that cut-off date to market realities. We appreciate CARB's efforts to introduce the proposed changes to allow for nameplate adjustment and its willingness to solicit feedback from industry.

Please contact Jonathan Stewart at jonathan.stewart@nema.org with questions or to discuss further.

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Airgas USA LLC

Concorde Specialty Gases

DILO Company, Inc.

Electronic Fluorocarbons, LLC

G&W Electric Company

Mitsubishi Electric Power Products, Inc.

S&C Electric Company

Sacramento Municipal Utility District

San Diego Gas & Electric

Schneider Electric

Siemens Energy, Inc.

Solvay Fluorides, LLC

Toshiba International Corporation