



REQUEST FOR FEEDBACK:

Proposed Updated Framework for Partners of EPA's SF₆ Emission Reduction Partnership for Electric Power Systems

BACKGROUND AND REQUEST FOR FEEDBACK

EPA has developed a new framework for the Electric Power Systems (EPS) Partnership informed by feedback engagements with Partners earlier this year. EPA is requesting comments from Partners on these proposed updates via SF6partnership@epa.gov by **February 3, 2025**.

Overview

Since 1999, the EPS Partnership has supported its Partners' leadership in reducing SF₆ emissions through implementation of best practices. In recent years, innovations and alternative technologies have been rapidly evolving, increasing the options and opportunities available to Partners. Therefore, after initial feedback engagements with Partners earlier this year, EPA is proposing a new framework to better support Partner needs and align with sector updates. This framework would enhance tracking of emission reductions and broader industry trends in best practices and alternative technologies. Recognizing that reaffirming commitments may require some effort, EPA is requesting your feedback on these proposals to ensure that data EPA collects and shares will be most valuable for Partners.

Partnership Vision and Mission

The Partnership vision and mission statement incorporate feedback received from Partners in the early part of 2024 and have guided the proposed updates.

PROGRAM VISION

An electricity grid that protects human health and the environment.

MISSION STATEMENT

A collaboration between EPA and the U.S. electric power industry to reduce emissions of SF₆ and other potent greenhouse gases through cost-effective best practices and alternative technologies.

To accomplish its objectives, the Partnership aims to:

- i. **Increase collaboration** between EPA and key constituencies.
- ii. **Increase awareness** of SF₆ emissions associated with the current and expanding grid.
- iii. **Promote research and development** of market ready SF₆ alternatives.
- iv. **Increase deployment** of cost-effective SF₆ alternatives and best practices.

Proposed Updates to Partnership Framework

EPA has developed three proposed forms for Partners to complete, described in more detail in the following section. The Partnership Agreement, submitted once, commits Partners to complete the additional two reporting forms each year: an emissions update and a best practices and technologies summary. The proposed Partnership Agreement update would also commit Partners to fulfill three other requirements: establish a base year, identify an emissions reduction target, and demonstrate leadership and innovation. Once the proposed framework is finalized, EPA intends to periodically reevaluate this framework and potentially revise it based on the needs of the Partners, industry trends, and technological advancements.



PARTNERSHIP AGREEMENT

- **Proposed Requirements.** The Partnership Agreement Form would be signed and submitted to EPA for a utility to be recognized as a Partner. All existing Partners also would sign this form, which would supersede the previous Memorandum of Understanding. By signing, utilities would agree to commit to the responsibilities listed in Table 1.

Table 1: Partner Responsibilities Described in the Partnership Agreement Form

RESPONSIBILITY	DESCRIPTION OF RESPONSIBILITY
Annual Emissions Update	Submit an update each year on system-wide emissions of insulating gases.
Annual Best Practices and Technologies Summary	Submit a summary of best practices implemented, insulating technologies deployed, equipment procured, and other organizational information as it relates to emission reductions of insulating gases.
Establish a Base Year	Establish a calendar year from which to begin estimating and providing data on greenhouse gas emissions of insulating gases. ¹ The base year may be the year in which the agreement is signed or the prior year. Existing Partners would update any previously established base year upon signing the new agreement form.
Establish an SF ₆ Emissions Reduction Target	Establish a voluntary SF ₆ emissions reduction target in accordance with established best practices. ² Additionally, EPA encourages partners to work towards a system-wide (e.g., 1% or less) SF ₆ emissions rate.
Leadership and Innovation	Demonstrate leadership and innovation in the pursuit of SF ₆ emission reductions and transition to SF ₆ alternatives in relevant electric power system planning.

¹ See 98.308 in [89 FR 31802](#) for definition of reportable insulating gas.

² EPA's Center for Corporate Climate Leadership [target setting resources](#).

- **Implementation.** Partners would sign and submit their Partnership Agreement to EPA. When Partners meet or exceed their emission reduction target, a new target can be set in a modification to their Partnership Agreement.
- **Rationale.** Partners have made significant emission reductions since 1999, and these achievements will continue to be recognized. However, as the sector continues to rapidly evolve, new targets will continue to drive the program forward. A renewed agreement signifies the voluntary commitment Partners are continuing to make to the Partnership and aligns Partners and EPA on vision and mission. Information provided by Partners helps EPA create valuable resources for Partners on the state of emissions, best practices, market transitions, and technological advancements. Partners that don't meet the responsibilities described in the table would no longer be participating Partners.



ANNUAL EMISSIONS UPDATE

- **Proposed Requirement.** Partners would commit to provide, on an annual basis, their calculated emissions of SF₆ (and other insulating gases and gas mixtures with GWP_{100 year} > 1), and corresponding inputs (e.g., acquisitions, disbursements), from electric power systems.
- **Implementation.** EPA proposes the continued use of the IPCC Tier 3 approach, a utility-level mass-balance approach, which Partners and facilities subject to the Greenhouse Gas Reporting Program (GHGRP) are already familiar with. Partners that are subject to the GHGRP would satisfy their voluntary emissions reporting commitment to the Partnership by submitting a copy of their mandatory emissions report to the Partnership. A similar but streamlined form with fewer data fields would be available for Partners not subject to GHGRP to provide their data to the Partnership.
- **Rationale.** Annual emission estimates enable Partners to monitor and measure emission reductions, benchmark performance relative to baseline year emissions, and inform Partnership trends and progress. Additionally, syncing reporting forms with GHGRP reduces burden for many current Partners who are also subject to GHGRP.



ANNUAL BEST PRACTICES AND TECHNOLOGIES SUMMARY

- **Proposed Requirement.** Partners would commit to provide annually on basic utility information, equipment, adoption of SF₆ alternatives, and other helpful information on best practices in a summary, aggregated format. A representative sample of proposed data elements is provided in Table 2.



Table 2: Annual Best Practices and Technologies Summary Data Elements

DATA ELEMENT CATEGORY	PROPOSED DATA ELEMENTS (REPRESENTATIVE SAMPLE)
Basic Utility Information	Company name; parent company name; utility classification (e.g., IOU, POU, COOP, Other); length of transmission miles and distribution miles by state and in total; GHGRP reporting status; last year reported to GHGRP; organizational-wide ESG goal or other goals that support participation with the Partnership.
GIE Equipment	Number of gas-insulated equipment (GIE) owned or in procurement, by equipment type and voltage groupings; average cost and procurement timelines of such equipment; and other GIE equipment data (e.g., average age and nameplate capacity by voltage rating grouping).
Alternative Equipment	Number of SF ₆ -free equipment owned, being tested, and in procurement, by equipment type, technology type (e.g., vacuum, alternative F-gas), and voltage groupings; average cost and procurement timelines of such equipment; and average age and nameplate capacity by voltage rating grouping.
Best Practices	Best practices used during the year (e.g., training, equipment upgrades, recycling, leak detection); short description of these strategies; and additional basic information on whether asset and cylinder inventory management systems are in use.

- **Proposed Implementation.** Partners would provide this information to the Partnership by filling out the Annual Best Practices and Technologies Summary. This summary would provide space for qualitative and aggregated answers and would use drop-down menus where appropriate to reduce burden.

EPA specifically requests feedback on providing more detailed information on each piece of GIE and SF₆-free equipment owned or in the process of being procured--serial number; equipment type; manufacturer; year manufactured; voltage; nameplate capacity.

Are these details reasonable for Partners to provide and subsequently beneficial for EPA to collect, aggregate, and share as a Partnership resource? This granular level could be made optional but that could reduce the quality of insights the Partnership could then provide back to the Partners.

EPA also specifically requests feedback on whether other related best practices and alternative technologies data may generate additional insights to support Partners' efforts to reduce SF₆ emissions. Please note that the Partnership does not intend to publish any Partner-specific information, but anything submitted has the potential to be disclosed publicly. To that end, submitting confidential information is discouraged.

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- **Rationale.** Providing additional basic information from Partners enables better understanding of Partnership diversity to inform programming and ensure coordination amongst state level reporting efforts. Information such as transmission miles by state also would improve the accuracy of EPA's estimations of SF₆ emissions from each state in the agency's annual state inventories. Sharing information on best practices supports further development of resources for Partners and the potential to highlight individual Partner accomplishments through case studies and other materials. Inventory and procurements information helps the Partnership generate insights into market trends in SF₆ and alternative technologies to support Partners' strategic planning and a broader market transition.

Other Proposed Updates

EPA specifically requests comment on the additional proposed updates:

PARTNERSHIP ACCOMPLISHMENTS

- Would Partners find it beneficial for EPA to update the [Accomplishments section of the Partnership website](#) to enable Partners to privately compare their own performance metrics versus aggregated metrics such as:
 - Average Partnership Emissions Rate
 - Average Emissions Rate (by region or by utility classification - IOU, POU, coop, etc.)
 - Percent of Partners using best practices

MARKET INSIGHTS

- Do Partners think there is benefit to EPA maintaining a publicly accessible website providing insights about SF₆ and alternative GIE based on data reported to Partnership? Insights could include trends in metrics such as:
 - Partnership average percent of inventory of SF₆ GIE and Alternative GIE Year-Over-Year by voltage classification
 - Year-Over-Year Percent increases in procurements of alternatives versus SF₆

OTHER

- Are there other aggregated insights, including additional suggestions in the areas above, that would be useful, and that Partners would be willing to report to the Partnership?
 - Please note again that while EPA has no intention to disclose Partner specific information, anything submitted to EPA is subject to disclosure.

How to Provide Feedback

We encourage those interested in providing feedback or clarifying questions to EPA via SF6partnership@epa.gov by **February 3, 2025**. Please note that EPA will not address comments individually but will instead provide a summary of the comments.