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Position Paper

On the Plans of the European Commission for the Revision of the Regulation on fluorinated Greenhouse Gases (2014/517/EU)

Follow-up to the workshop on May 6th, 2021

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The German Association of Energy and Water Industries (BDEW) and its regional organisations represent over 1,900 companies. The membership comprises both privately and publicly owned companies at the local, regional and national level. They account for around 90 percent of the electricity production, over 60 percent of local and district heating supply, 90 percent of natural gas, over 90 percent of energy networks and 80 percent of drinking water extraction as well as around a third of wastewater disposal in Germany.

BDEW feedback on the Plans of the European Commission for the Revision of the Regulation on fluorinated Greenhouse Gases (as a follow up to the workshop on May 6th, 2021)

BDEW supports the European Commission's plan to amend the regulation on fluorinated greenhouse gases (517/2014/EU) and, in particular, to adapt it to the increased climate targets. Against this background, the provisions for the use of sulphur hexafluoride (SF₆) should also be considered.

As part of the development of new provisions for the operation of electrical switchgear, the special requirements of the energy industry and thus of security of supply must be taken into account. This applies to both the practical availability of alternatives to SF₆-insulated equipment and to the time required to switch over to the operation of new technologies. In addition, potentially stricter monitoring measures must be critically questioned with regard to their benefit in the context of cost-efficient decarbonisation.

Availability of alternatives

The briefing paper for the workshop on May 6th 2021 proposes the prohibition of the placing on the market of new electrical switchgear at all voltage levels that uses an insulating or breaking medium that exceed a certain Global Warming Potential (GWP) (in the draft: 500), unless evidence is provided that no other suitable alternative is available on technical grounds.

BDEW points out that there must be sufficient market availability of alternative, reliable products suitable for the respective environment before such a regulation starts to apply. Products from at least two manufacturers (to avoid the creation of a monopoly) and in sufficient quantities must be available. Only when these conditions are met the necessary grid expansion, which is urgently needed at all voltage levels for the success of the energy transition, can be achieved.

Sufficient transition periods

Even when market availability of alternatives to SF₆ – as described above – is reached, a ban on placing existing technologies on the market must not yet take effect. Rather, operators of electrical switchgear require transition periods during which the adaptation of technical specifications, the prequalification of manufacturers and products, the technical approval after initial operating experience, the conversion of purchasing contracts, and the project durations of several years (from tendering to procurement to installation of the equipment) can be realised. Details on this and the estimation of suitable transition periods for the various voltage levels are presented in the VDE FNN information "Übergangszeiten für alternative gasisolierte

elektrische Betriebsmittel notwendig" (Transition periods necessary for alternative gas-insulated electrical equipment) of 6 April 2021¹.

Monitoring

According to the presentation in the workshop on May 6th 2021, the consultants of the European Commission recommend an extension of the monitoring of SF₆ emissions by operators of electrical switchgear.

The coordinated recording and monitoring of SF₆ emissions is generally a suitable instrument. The operators of electric grids in Germany have therefore already introduced a monitoring system many years ago. Consequently, SF₆ emissions from the production and use of electrical equipment in Germany have fallen significantly over the past 20 years, as publications by the German Federal Environment Agency (Umweltbundesamt) show².

However, if monitoring obligations were to be tightened, a balanced cost-benefit ratio in relation to cost-efficient decarbonisation would have to be considered. In those areas where there is already established and effective monitoring, it is questionable whether the effort stemming from further obligations could be justified. Consequently, all emitters would have to be included in an extended monitoring, i.e. not only the operators of electrical switchgear, but also their manufacturers and producers of SF₆ as well as the manufacturers and users of other applications of SF₆.

With regard to electrical equipment, it should also be noted that in many switchgears on the secondary medium-voltage level (where about half of the SF₆ used by the entire energy industry is stored) refilling is not possible.

¹ VDE FNN Info „Übergangszeiten für alternative gasisolierte elektrische Betriebsmittel notwendig“, 06.04.2021; available online at <https://www.vde.com/de/fnn/arbeitsgebiete/umwelt-naturschutz/sf6> (German and English version)

² See Umweltbundesamt: <https://www.umweltbundesamt.de/themen/klima-energie/fluorierte-treibhausgase-fckw/anwendungsbereiche-emissionsminderung/schaltanlagen>