

**KYLE PITSOR**

Vice President, Government Relations

May 11, 2017

VIA EMAIL TO: [nrcan.equipment.nrcan@canada.ca](mailto:nrcan.equipment.nrcan@canada.ca)

Office of Energy Efficiency  
Natural Resources Canada  
930 Carling Ave, Building 3, 1st Floor  
Ottawa, Ontario, K1A 0Y3

**NEMA Comments on Technical Bulletin – Amendment 15 to the Energy Efficiency Regulations**

Dear Ma'am/Sir,

The National Electrical Manufacturers Association (NEMA) submits these comments to the subject technical bulletin. These comments are submitted on behalf of NEMA Power Electronics Section member companies who manufacture and sell Uninterruptible Power Supplies (UPS).

NEMA is the association of electrical equipment and medical imaging manufacturers, founded in 1926 and headquartered in Arlington, Virginia. The National Electrical Manufacturers Association (NEMA) represents nearly 350 electrical and medical imaging manufacturers. Our combined industries account for more than 400,000 American jobs and more than 7,000 facilities across the U.S. Domestic production exceeds \$117 billion per year.

NEMA appreciates NRCan's effort to harmonize with U.S. federal energy efficiency standards. We further appreciate the verbal comments of NRCan staff on the April 30<sup>th</sup> webinar in which they recognize that U.S. UPS standards are not finalized and that the NRCan proposal will need to adjust to maintain alignment as the regulatory process in the U.S. runs its course.

With that in mind, we summarize our concerns as follow so that they may be on the record. The document referenced in the NRCan technical bulletin of April 13, 2017<sup>1</sup> is a U.S. Department of Energy pre-publication document. It is not final. NEMA has requested<sup>2</sup> the U.S. Secretary of Energy to review this rule citing analytical mistakes and factual concerns. NEMA believes that a revised U.S. UPS energy efficiency standard can be achieved and issued by DOE. Accordingly, NEMA recommends that NRCan suspend its current effort to adopt the U.S. pre-publication document until the U.S. DOE completes its review and issues a statement on the UPS proposed standard. We suggest this course of action in support of our joint efforts to harmonize product efficiency standards between the U.S and Canada markets. Adopting different standards would not be in the best interests of consumers, could reduce product

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<sup>1</sup> <http://elink.clickdimensions.com/m/1/23278406/02-b17108-f613ab57a722450797db5fab061f6702/1/186/bfda959b-828b-435d-9cf4-1637293f2407>

<sup>2</sup> <https://www.regulations.gov/document?D=EERE-2016-BT-STD-0022-0029>

offerings, and create considerable market confusion. We look forward to working with NRCan staff to develop the best proposal possible to maintain harmonization once the U.S. process concludes.

Furthermore, we note that performance testing standards for UPS product already exist in Canada. These standards reference CSA standard C813.1-14 and any move to change Canadian regulations for UPS must address this fact. This is important to note because verbal statements from NRCan staff on the April 30<sup>th</sup> webinar indicate the new Canadian regulations might refer to CSA standard C381.2-14, which NEMA views as an incorrect reference for UPS testing.

Our Member companies count on your careful consideration of this response and look forward to an outcome that meets their expectations. If you have any questions about this letter, please contact Alex Boesenberg of NEMA at 703-841-3268 or [alex.boesenberg@nema.org](mailto:alex.boesenberg@nema.org).

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor". The signature is written in a cursive, flowing style.

Kyle Pitsor  
Vice President, Government Relations