



KYLE PITSOR

Vice President, Government Relations

December 20, 2016

VIA EMAIL TO: nrcan.equipment.nrcan@canada.ca

Debbie Scharf
Office of Energy Efficiency
Natural Resources Canada
580 Booth Street
Ottawa, ON, K1A 0E4

NEMA Comments on Natural Resources Canada Amendment 14 Technical Bulletin and Coming-Into-Force Delay

Dear Ms. Scharf,

The National Electrical Manufacturers Association (NEMA) submits these comments to the subject technical bulletin. These comments are submitted on behalf of NEMA Motor and Generator Section member companies.

As you may know, 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 400 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 does not support the request to waive the standard 6-month implementation period for electric motor regulations in Canada. While we appreciate harmonized regulations and sympathize with NRCan's desire to implement them as soon as possible, the proposed effective date tied to the indeterminate date of final publication in the Canadian Gazette is a "soft" deadline and represents uncertainty. While motors built to the coming standards exist, motors built to current regulatory requirements in Canada also exist both in U.S. and Canadian provincial warehouses. Cross-border shipments of these existing motors will be prohibited following the coming-into-force of Amendment 14. Manufacturers and distributors need clear deadlines for planning movement and sell-through of existing products. The uncertainty of the final publication date is insufficient for planning. The 6-month post-publication implementation period exists for such reasons.

It is our position that NRCan should maintain the practice of a 6-month implementation period for electric motor regulations.

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.

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