

June 14, 2018

VIA EMAIL TO: nrcan.equipment-equipement.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 March 31, 2018 Pre-Publication Energy Conservation Standards for Dry-Type Transformers

Dear Ms. Scharf,

The National Electrical Manufacturers Association (NEMA) submits these comments to the subject pre-publication notice. These comments are submitted on behalf of NEMA Dry-Type Transformer Section Member companies.

NEMA represents nearly 350 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems. Our combined industries account for 360,000 American jobs in more than 7,000 facilities covering every State. Our industry produces \$106 billion shipments of electrical equipment and medical imaging technologies per year with \$36 billion exports.

NEMA agrees with the proposed harmonization of energy conservation Standards' levels with existing United States Department of Energy standards.

We note that the CSA Test Procedure referenced¹, CSA 802.2-12, draws from NEMA Standard TP-2. This NEMA standard has been rescinded, which has resulted in the CSA Standard becoming out-of-date. The correct current reference is the U.S. DOE Test Procedures for Distribution Transformers found in the 10th Code of Federal Regulations Part 431, Subpart K, Appendix A². Since NRCan must reference a specific dated revision of a Standard rather than an undated series, in the interest of time (i.e. not waiting for CSA to update 802.2 before harmonizing dry-type transformer Standards) NEMA recommends NRCan reference the aforementioned U.S. DOE test procedures. These test procedures, like the ones of NRCan, are available publicly at no cost and industry has already updated practices to these DOE test procedures. Consequently, no burden will result. Conversely, maintaining the CSA 802.2-12 reference to NEMA TP-2 likely will cause confusion and potential enforcement questions.

If you have any questions about this letter, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,



Joseph Eaves
Acting Department Head Government Relations
National Electrical Manufacturers Association

National Electrical Manufacturers Association
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¹ <http://www.nrcan.gc.ca/energy/regulations-codes-standards/18468>

² <https://www.gpo.gov/fdsys/pkg/CFR-2013-title10-vol3/xml/CFR-2013-title10-vol3-part431-subpartK-appA.xml>