

T&D Europe¹ position paper on a possible European Commission Regulation implementing Directive 2009/125/EC with regard to small, distribution and power transformers (Commission Working Document of 11.10.2012 and meeting of the Consultation Forum held on 9.11.2012)

Brussels, 6th December 2012

The European transformers manufacturing industry represented by T&D Europe thanks the European Commission for giving stakeholders another opportunity to provide comments to both its Working Document of 11.10.2012 and to the outcome of the meeting of the Consultation Forum held on 9.11.2012. While recalling our position paper of 6th November 2012, we would like to underline the following:

T&D Europe supports option D described on page 13 of the European Commission presentation at the Consultation Forum on 9.11.2012, which reads: *Move ahead with minimum requirements for MPTs only (and possibly information requirements for LPTs) and prepare a separate regulation for LPTs when sufficient/reliable data are available.*

Moreover, any regulation proposal should be the result of an attempt to a consensus between the main concerned stakeholders, including the electricity producers, transporters, and the transformer manufacturers.

With regards to small and medium power transformers ($\leq 36\text{kV}$), T&D Europe considers that a good set of implementing measures is within reach. However, we would like to get the following modifications to allow to satisfying manufacturers and the feasibility of the transformers.

- Tier 2 should be implemented in 2020 instead of 2018;
- The level of losses of delivered transformers must be controlled randomly at EU level;
- Level of losses for 160kVA for pole mounted transformers should be C0 ($Ck*1,32$) for weight reasons;
- For 2020 tier 2 it is possible to manufacture transformers with a level of losses A0 -15% instead of A0 -20% where feasibility is not demonstrated.

¹ T&D Europe (www.tdeurope.eu) is the European Association of the Electricity Transmission & Distribution Equipment and Services Industry, which members are the European National Associations representing the interests of the electricity transmission and distribution equipments manufacturing and derived solutions. The companies represented by T&D Europe account for a production worth over € 25 billion EUR, and employ over 200,000 people in Europe.

With regards to large power transformers (> 36Kv), in order for option D to materialise quickly, T&D Europe proposes that the Sub Group on Large Power Transformers set up by the European Commission under the Consultation Forum continues its activities until 30 June 2013 and comes with a technical and economic solution which should be found between the public authorities, utilities, transporters, transformer manufacturers, standardisation bodies and environment NGOs.

T&D Europe will contribute to the work of the Sub Group by setting a specific Task Force composed of company experts in Large Power Transformers.

Finally, with regards to the Working Document of 11.10.2012, definitions should be aligned with the definitions contained in the relevant EU standards.