

Brussels, 21st November 2013

T&D Europe Position Paper on a Draft Commission Regulation implementing Directive 2009/125/EC with regard to small, medium and large power transformers (19th September 2013)

The European transformers manufacturing industry represented by T&D Europe¹ thanks the European Commission for publishing the draft regulation on Eco-design for small, medium and large power transformers sent to the WTO on 19th September 2013.

In view of the discussions and vote in the Regulatory Committee of the Eco-design Directive in December 2013, T&D Europe presents the following comments to the attention of the members of the Regulatory Committee

A) Proposal to complete recitals 7 and 10 to better reflect the current economic practices:

Recital 7:

- In the first sentence we suggest to add as follows (in italics and red): Ecodesign requirements for the energy performance/efficiency of medium power transformers and for the energy efficiency of large power transformers should be set with a view to harmonising ecodesign requirements *in all procurement processes for losses calculation* for these devices throughout the Community.
- In the second sentence to complete the sentence by (in italics and red): Such requirements would also contribute to the efficient functioning of the internal market and to improving Member States' environmental performance *towards products and systems innovation and efficiency*.

Recital 10:

- We suggest to complete the sentence by (in italics and red): To allow an effective implementation of the regulation, National Regulating Authorities are advised to take account of the effect of minimum efficiency requirements on the initial cost of the transformer and to allow for more efficient transformers than the regulation requires if these are economically justified on a whole life cycle basis, *with relevant evaluation of losses reduction for the products and for the systems*.

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.

B) Reference to standards

Moreover, we question the lack of reference to harmonised standards in the draft regulation, which is not in line with:

- a) The previous draft of 15th July (where a reference was included in Annex II on measurement and calculation methods);
- b) The other Eco-design regulations.