From: Greg Coulter [mailto:greg.coulter405@gmail.com]
Sent: Friday, October 29, 2010 4:13 PM
To: Barhydt, Laura
Cc: Armstrong, Ashley; Leon Chapa Ismael Ricardo (GE Infra Energy
Subject: GE-Prolec CCE Meeting October 19,2010

Ms. Barhydt,

This e-mail documents the GE-Prolec CCE meeting of October 19, 2010 concerning Docket No. EERE-2010-BT-CE-0014. Mr. Ismael Leon and myself met with Ms. Ashley Armstrong, Ms. Celia Sher, Ms. Stephanie Weiner, and Ms. Laura Barhydt in your offices and discussed the attached charts concerning this NOPR.

We appreciated the opportunity to meet with you and share a dialogue on the existing rule and changes outlined in the latest NOPR. You had specifically asked us to provide additional comments on our Issue #1. After further review, we continue to believe that the variety in ratings and designs needed to serve the US Distribution Transformer market supports a different approach for these covered products. While we do understand DOE's desires for complete model submittals, we continue to believe that such reporting requirements would be unmanageable by both the manufacturers and DOE.

Our US customer base consists of mainly larger entities (investor owned utilities, rural electric cooperatives, municipal electric systems, and some industrial companies) with knowledgeable technical personnel who specify and evaluate their distribution transformer requirements. They understand the range of efficiencies available, from those that meet the standards at lowest first cost to those that far exceed the current minimum efficiencies. Our customers provide specific guidelines on what they want, including economic evaluation factors for transformer electrical losses which we and other manufacturers use to offer our best match to these needs.

The wide range of economic, loading, and fundamental electrical system configurations in the US electric system drives thousands of basic models. For example, with liquid-immersed distribution transformers, the fundamental electrical rating elements alone (number of phases, kVA rating, high voltage rating, high voltage BIL, high voltage tap configuration, and low voltage rating), without including other features or efficiency, result in more than 25,000 possible combinations, many of which are purchased by one or more customers in a year. This variety is a result of differences in electrical systems as they evolved over the last 130 years and the wide range of end user applications served by our utility customers. The addition of other features and efficiencies, driven by customer loading and economic evaluations of the no load and load loss characteristics of the unique designs, takes the resulting estimate of design variety (e.g., basic models) well beyond the 25,000 estimate. Finally, manufactures are adjusting their designs through the year to take advantage of material costs changes, which could drive even more model variations. The number of basic models actually created and sold by a single manufacturer in a given year might be 10-20% of the total configurations required for the market – still a very large number of unique models for each product type.

As we reviewed the existing CCMS templates for other products, it is clear that input process is designed for products and equipment with limited variety. We cannot envision how such a system would work with thousands of models entered annually.

If you have any questions or would like further information, please feel free to contact us.

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