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June 29, 2012

Via Email: DistributionTransformers-2010-STD-0048@ee.doe.gov

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
EERE-2010-BT-STD-0048
1000 Independence Avenue, SW
Washington, DC 20585-0121

Re: Energy Conservation Standards for Distribution Transformers
Docket No. EERE-2010-BT-STD-0048
(RIN) Number 1904-AC04

Dear Ms. Edwards:

Baltimore Gas and Electric Company (BGE) appreciates the opportunity to submit additional comments requested in Section 1-A.7 of Appendix 1-A – Summary of Supplemental Post-Notice of Proposed Rulemaking Analyses for Distribution Transformers (Supplemental Rulemaking Submission) issued by the Department of Energy (DOE) on May 29, 2012.

BGE is a subsidiary of Exelon Corporation and Maryland's largest gas and electric utility. Headquartered in Baltimore, BGE provides service to more than 1.2 million electric customers and more than 650,000 natural gas customers in central Maryland.

In addition to the comments submitted on April 10, 2012, BGE would like to submit the following comments:

I. Comments on Specific Issues Raised by DOE

In the Supplemental Rulemaking Submission, DOE requested stakeholders to submit comments regarding four issues. Unless otherwise noted here, BGE has no comments.

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Issue 1: DOE requests comment on the new equipment class definitions.

Response: BGE supports the concept of separating liquid filled distribution transformers into specific classes as defined in the Supplemental Rulemaking Submission. For example, "Pole Mounted", "Pad Mounted" and "Network and Vault" classifications are well-known in the utility industry and each class has specific challenges that need to be considered by DOE in determining the efficiency requirements.

Issue 3: DOE requests comment on the appropriate efficiency levels for network/vault and \geq BIL equipment classes.

Response: Due to the stringent size constraints on network and vault type transformers, BGE supports maintaining the current efficiency standards for these types of transformers. The number of network and vault type transformers utilized by the utility industry is small compared to the total liquid filled distribution transformer usage. Generally, network/vault type transformers are installed in either building vaults or street or sidewalk vaults that are constrained by their surroundings. It is essential to maintain standards that do not increase the size of these transformers.

Although BGE does not purchase 200kV BIL transformers, these transformers would have similar construction and weight limitations. Thus, we also support maintaining the current efficiency standards for these types of transformers.

Issue 4: DOE requests from utilities pole replacement costs by transformer capacity.

Response: BGE does not track pole replacement costs by transformer capacity. There are a number of factors, including, but not limited to, the size and weight of transformers, that affect pole replacement costs. Currently, telephone, cable TV and private communication companies utilize pole capacity on BGE system. When we need to replace an existing transformer with a larger and/or heavier one, we need to perform extensive loading and clearance checks to ensure that we are meeting all applicable regulatory requirements. Thus, this type of installation often requires extensive work. Further, if the installation creates loading or clearance issue because of the increased size or weight of the transformer, then we are required to make sure that the entire installation (not just the transformer) meets applicable regulations. When poles need to be replaced, multiple utilities are affected, each one with related costs. In 2011, the average replacement cost for a pole with a transformer was \$7,100. If other equipment (such as regulators, capacitors, 34kV lines, etc.) was attached to the pole, the average cost was \$9,850.

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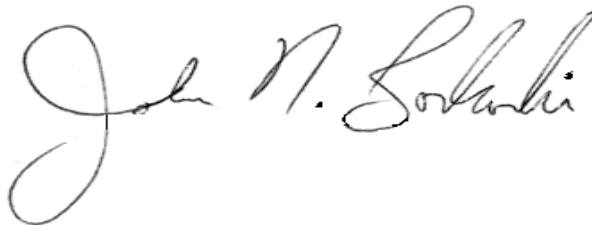
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Please contact me if you have any questions regarding our submission.

Respectfully Submitted,

A handwritten signature in black ink that reads "John N. Borkoski". The signature is written in a cursive style with a large, looping initial "J".

John N. Borkoski
Baltimore Gas and Electric Company
Vice President, Electric Distribution