**Comments on “a proposal to amend Ontario Regulation 509/18, Part A, Dry-type distribution transformers”**

This proposal is asking for the following two amendments:

1. Exempt medium voltage dry type distribution transformers used in mining applications – underground as well as subsurface mining
2. Harmonize testing with CSA C802.2-18/DOE 2016

**Comments from Hammond Power Solutions:**

Hammond Power Solutions is a Canadian Corporation that manufactures Dry-type Transformers and is a major supplier to Canadian underground and subsurface mining applications.

Our observations are:

1. Dry-type transformers for underground or subsurface mining application are not exempt under latest NRCan and CSA standards.
	1. NRCan SOR/2018-201
	2. CSA C802.2-18

This “proposal” would de-harmonize energy efficiency regulation in Canada.

1. DOE 10 CFR-2016 exempts dry type transformers for underground mining applications but not for subsurface applications.

This “proposal” will have partial de-harmonization with DOE 10 CFR-2016

1. We have been supplying “Energy Efficient” medium voltage dry type distribution transformers that meets EE regulation NRCan 2012 and Ontario EE Regulation 404/12 for last 8 years.

Canadian mining industry has been using energy efficient transformers (to NRCan 2012 level) for many years. Their equipment applications are established accordingly.

1. For last one year, we have been supplying “Energy Efficient” medium voltage dry type distribution transformers meeting Ontario EE Regulation 404/12, amendment O. Reg. 419/16. EE requirements of this amended Ontario regulation is in agreement with NRCan SOR/2018-201.

Technically it is feasible and economically it is viable to meet the present Ontario EE regulation 404/12 amendment O. Reg. 419/16 and NRCan SOR/2018-201 new requirements for MV dry type transformers. With better grade of commercially available electrical steel and improved manufacturing techniques, it has been possible to keep the effect of any dimensional increase to minimum.

1. We welcome the harmonization of testing methods with CSA C802.2-18, NRCan 2018 and DOE 2016.

**As Ontario and Canada have been using energy efficient transformers for last several years, exempting these products from EE requirements would be a step backward. There is an economic justification for improved efficiency. Also the “proposed” amendment de-harmonize Canadian regulations and CSA standard.**

* **We support the harmonization of test requirements with CSA, NRCan and DOE.**
* **We also support harmonization of Ontario energy efficiency requirements, for Ontario mines, with CSA and NRCan.**

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