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Mr Uwe Kampet
CENELEC
Vice-President Technical
Avenue Marnix 17
B-1000 Brussels
Belgium

Dear Mr Kampet,

Thanks for your letter of 26 November 2014 about CENELEC's response to Amendment 2 of our horizontal Mandate M/495 in support of the Ecodesign Regulation on transformers.

Let me say first of all how grateful we are for the work carried out by CENELEC Technical Committee 14 last year on collecting data for large power transformers. Without this data and the related analysis of efficiency levels, it would have not been possible to cover these transformers in the Regulation.

This successful cooperation between CENELEC and the Commission led us to include a similar provision for data collection on the efficiency of these large power transformers in order to prepare for the review of the Ecodesign Regulation 584/2014 by 2017. We regret to read that you are not in a position to undertake this task. We understand that carrying out this task properly can be a resource intensive activity. Nevertheless, we very much hope that if these data collected by other means, experts in CENELEC TC 14 will be assisting the Commission in analysing this data.

Regarding your other point on the interpretation of tolerances in Regulation 584/2014, we are surprised by your argumentation. As it is the case with every other Ecodesign Regulation, verification tolerances are addressed exclusively to market surveillance authorities in their capacity to enforce minimum requirements. While the concepts of verification tolerance and measurement uncertainty are obviously related, we believe that the first one belongs to the regulatory framework and the second one to measurement standards.

Nevertheless, our services have discussed in numerous opportunities with experts in CENELEC the values of verification tolerances for losses (5%) in Regulation 584/2014. As the cumulative value of the standard deviation in the manufacturing process of

transformers plus the typical value of the measurement uncertainty of losses is in most cases below the value of tolerances, we are persuaded that there are no inconsistencies with the standards that CENELEC has developed to support Regulation 584/2014.

We remain at your disposal for any further clarification.

Yours sincerely,



Marzena Rogalska

Cc: Hein BOLLENS, HoU DG ENTR B5, Cesar Santos DG ENTR B1