

Mr Hein BOLLENS
Acting Head of Unit
DG ENTR
B.5 Standards for boosting
competitiveness
European Commission
Avenue d'Auderghem 45
B-1049 Brussels

Brussels, 26 November 2014

Subject: CENELEC response to Amendment 2 to Mandate M/495

Dear Mr Bollens,

Since the beginning of 2012 CENELEC has been developing work in the field of Ecodesign under Mandate M/495, accepted by the CENELEC Technical Board (BT) in its 139th meeting held in October 2011. Through a subsequent decision in its 146th meeting held in January 2014, CENELEC BT also accepted the work for the technical update to the Annex B to M/495 (Amendment 2 to M/495), related to standardization in the field of the ecodesign of small, medium and large power transformers.

Although the work programme for this mandate has been developed in close contact with our Technical Committee, some fundamental problems have recently been detected.

Firstly, a potential inconsistency between the interpretation of tolerances in Regulation No 548/2014 and in FprEN 50588-1:2014 'Medium power transformers 50 Hz, with highest voltage for equipment not exceeding 36 kV – Part 1: General requirements' has been identified. This work item is developed by CLC/TC 14 'Power transformers' and is currently under vote (2nd UAP). Subject to a positive outcome of the vote, this standard will be ratified and published.

However, some essential parts of FprEN 50588-1:2014 refer to prEN 60076-19 'Power transformers – Part 19: Rules for the determination of uncertainties in the measurement of losses in power transformers and reactors'. As you know, CENELEC gives primacy to international standardization to have globally relevant standards and

therefore prEN 60076-19 is based on IEC work (IEC/TS 60076-19). It is at this level that CLC/TC 14 identified potential inconsistencies with the Ecodesign Regulation requirements. This has resulted in the set-up of a dedicated Working Group under the CLC/TC 14 umbrella (WG 31) to identify and close the gap between prEN 60076-19 and the Ecodesign Regulation requirements. A corrigendum will then be issued for FprEN 50588-1:2014, replacing the current references to IEC/TS 60076-19 with references to the newly approved EN 60076-19, thereby preventing potential inconsistencies with the Ecodesign Regulation in the short run.

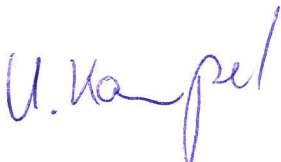
Secondly, CLC/TC 14 is facing a sustained issue with the following task assigned to CENELEC by the aforementioned technical update to the Annex B to M/495:

'(4) to collect data on the efficiency of the installed base of large power transformers and to provide efficiency benchmarks based on percentiles of the existing population, so as to facilitate the characterization of minimum energy efficiency requirements;'

When CLC/TC 14 started this task, important difficulties emerged on the necessary resources, developments and tools. This led to an extensive discussion on the issue within CLC/TC 14, CCMC and finally CENELEC BT. The final conclusion is that such a task would entail the setting-up of a dedicated tool for the data collection for large power transformers and that such a task is not a core standardization activity; neither does CENELEC have the necessary technical and human resources to properly carry out such a task. Because of these difficulties to fulfil this particular mandated task, CENELEC BT decided to reject that part of the mandate retroactively.

I trust you will find this explanation sensible enough to consider it when monitoring the progress of CLC/TC 14 in its response to M/495.

Yours sincerely,



Uwe KAMPET

CENELEC Vice-President Technical

C.c. Elena SANTIAGO CID, CEN & CENELEC Director General
César SANTOS GIL, Policy Officer - Sustainable industrial Policy - Eco-design Directive
CENELEC Technical Board