

## Transformers

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**From:** Transformers  
**Sent:** maandag 3 april 2017 10:18  
**To:** 'Nico Wurzel'  
**Cc:** paul@waide.co.uk; Cesar.SANTOS@ec.europa.eu; Van Tichelen Paul (paul.vantichelen@vito.be)  
**Subject:** RE: Important notification about comments received on draft 'Preparatory study for the review of Commission Regulation 548/2014 on Ecodesign requirements for transformers ': will be made public unless we receive an e-mail to request confidentiality

Dear Mr. Wurzel,

This has been overlooked. Please accept our apologies for that and I will add them to our file for processing in the final report.

I also classified them mainly relevant for LV/LV transformers (<1,1 kV), which is outside the focus of our Study and therefore the key points of the meeting.

Related to voltage levels:

In principle we refer to Lot 2 (2011) without repeating it, details of the used voltage BC1..7 levels are in the annexes and project report of 2011.

This means that all BC1-6 are MV. In our Review Study we will not consider LV/LV transformers, i.e. BC7, and thus review BC7 which is outside the scope.

But I take note that for the sake of better understanding and readability of the report I will add the voltage levels in the core text of our review report.

Rating plate information downscaling:

Noted.

Please see also ongoing work within CENELEC RC 14 (comments available).

Note that we are discussing medium and large power transformers. It is up to the EC to decide on this issue and this is also related to other products and their marking including horizontal market surveillance actions. Hence, the final word will not come from the study.

>In the study I will add a statement that 'our recommendation is for medium and large power transformers and therefore the area available does not provide an argument to reduce the amount of information. In the context of CE label requirements its market surveillance in future also other digital sources for maintaining relevant product information over its long (>40 years) life time of transformers could be considered, but therefore also an in depth technical and legal assessment will be needed which is outside the scope of this study. Nevertheless, having the information in digital form can have some benefits for preserving and accessing information. In this scenario access to product information from competitors will also be different and might involve data encryption and security. For data storage also a solution will be needed to cope with a manufacturer bankruptcy, e.g. a public database maintained by the EC could provide a solution.'

I hope this answers you main remarks ahead of our final update of the report.

Best regards,

Paul Van Tichelen

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**From:** Nico Wurzel [mailto:Nico.Wurzel@sba.de]  
**Sent:** vrijdag 31 maart 2017 15:05  
**To:** Transformers

**Subject:** AW: Important notification about comments received on draft 'Preparatory study for the review of Commission Regulation 548/2014 on Ecodesign requirements for transformers ': will be made public unless we receive an e-mail to request confidentiality

Dear Paul Van Tichelen,

i had sent them a statement by mail on 21.03.2017, why is this not published at the meeting or not with the email distributed to the stakeholder.

Our cooperation is here only useful, if our comment are also presented. I have not contradicted the publication.

Best regards

Nico Wurzel

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Registergericht: Handelsregister Gera, HRB 1783  
Geschäftsführer: Dipl.-Ing. Wolfgang Schatzler, Dipl.-Ing. Matthias Leipold

Statment from 21.03.2017:

Dear Paul Van Tichelen,

from my point of view, the report contains no clear definition of the transformers (range, voltage level, ...), such as:

- BC3 and BC7 can also be low-voltage transformers according to EN 61558 (input voltage below 1000V)
- BC7 could also be an isolating transformer according to EN 61558-2-4
- to exclude misunderstandings it is helpful always to specify the voltage level in the report, especially in the tables
- the power range gives no indication of the application area; LV transformers can also lie in the MVA range
- Definition of HV, MV and LV transformers is missing
- the values are presumably based on MV-transformers or HV-transformers, this will not certainly recognise everybody and can lead to interpretation mistakes
- our values are certainly not considered in this report ( see PDF, email from 12.12.2016)

Also is no information, that transformers less than 1000V input voltage are excluded from the consideration. This should be noted definitely with in the report.

With the last meeting in Brussels in the 9/16/2016 this was discussed because the LV-transformers are rather of subordinated kind and here also no real potential is too recognizable.

Besides, is to be considered that these transformers often are only operated with the machine, system or plant and normally have no-load operation.

Also the marking should reconsidered. The information specifics of the substances of transformers is impractical and not is relevant for the customers, as well as internal know-how of the manufacturer.

It is rather unfavourable information (Directive 548/2014 point 3. a, c and d) on the rating plate, because there are too much information. There should be sufficient in the technical documentation or in the data sheet. On the rating plate no later looking more, but on the datasheet. The data sheet is often in digital form and therefore endless durable. However, the rating plate is not often any more readably after some years. We have seen this often by exchange of a old transformers.

For example, the statics plan of an house is not written to the facade or the weights and filling amounts of a car are marked on an plate in the engine space. This information is always to be found in external documents. By cars such information is not even given, so that one is made visit a authorized dealer. Such information on the rating plate is to be found with no other electric device (plastic weight and kind by a vacuum cleaner...). However, we as a transformer manufacturer have to go all revealing. This does not function.

Best regards

Nico Wurzel

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**Von:** Transformers [<mailto:transformers@vito.be>]

**Gesendet:** Freitag, 24. März 2017 17:53

**An:** [Cesar.SANTOS@ec.europa.eu](mailto:Cesar.SANTOS@ec.europa.eu); [paul@waide.co.uk](mailto:paul@waide.co.uk); Van Tichelen Paul

**Betreff:** Important notification about comments received on draft 'Preparatory study for the review of Commission Regulation 548/2014 on Ecodesign requirements for transformers ': will be made public unless we receive an e-mail to request confidentiality

Dear Stakeholder,

We received several comments from stakeholders on the draft report for discussion in the meeting on next Wednesday 29/3.

Hereby we want to inform you that **they will be made public, unless you explicitly request confidentiality by a reply on this e-mail before Monday 27/3 14h CET .**

Note: if they cannot be made public it is uncertain that we can discuss them and they are only considered background information for the study.

Best regards,

Paul Van Tichelen

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