**Questions for NRECA Members – Distribution Transformer Energy Conservation Standard Proposed Rule**

1. What is the average service lifetime for the distribution transformers you utilize?
2. What is the average extension of distribution transformer service life that can be achieved with rebuilding/refurbishing?
3. Would a move to amorphous steel core transformers make you more likely to rely on refurbishing your existing transformers?
4. Is your cooperative substituting liquid-immersed distribution transformers with medium-voltage dry type transformers today?
5. What are the typical concrete pad dimensions for 50 and 500 kVA single- and 500 and 1500 kVA three-phase distribution transformers? What is the typical service lifetimes of these concrete pads?
6. What is the typical total ownership cost (TOC) adoption rate you use when comparing bids for transformer requests? DOE is using an assumed TOC adoption rate of 10 percent.
7. What is the Per Unit Load (PUL) applied to distribution transformers owned and operated by utilities serving low customer populations?
8. What operational concerns do you have with a move to amorphous steel core transformers?
9. Do you have experience using amorphous steel core transformers in the field, and what has the experience been?
10. What is the typical maximum lifting capacity of bucket or line trucks being used to install distribution transformers? What is the typical transformer capacity being installed with these trucks?
11. How would this proposal impact wood pole size and wood pole replacements?
12. Are there any other operational changes that cooperatives may need to make with a move to amorphous steel core transformers aside? (Consider increased volume size impact to concrete load limits or vault size)