



January 30, 2023

Mr. Alejandro Moreno  
Assistant Secretary (Acting), Deputy Assistant Secretary for Renewable Power  
Office of Energy Efficiency and Renewable Energy  
Mailstop EE-5B – 1000 Independence Avenue, SW  
Washington, DC 20585-0121  
Submitted via: [DistributionTransformers2019STD0018@ee.doe.gov](mailto:DistributionTransformers2019STD0018@ee.doe.gov)

**RE: Joint Request for Extension of Public Comment Period on the Proposed Energy Conservation Program: Energy Conservation Standards for Distribution Transformers  
Docket No. EERE-2019-BT-STD-0018**

Dear Mr. Moreno:

On behalf of the American Public Power Association (APPA), Edison Electric Institute (EEI), and National Rural Electric Cooperative Association (NRECA) (collectively, the Joint Associations), we request that the U.S. Department of Energy (DOE) provide a 60-day extension of the public comment period, until May 12, 2023, on the Energy Conservation Standards for Distribution Transformers that was published in the *Federal Register* on January 11, 2023 (Proposed Rule). The Joint Associations also respectfully request that DOE act on this request by no later than February 13, 2023, to provide all interested parties with certainty in this regard as soon as possible so that they can plan accordingly.

APPA is the national trade organization representing the interests of the nation's 2,000 not-for-profit, community-owned electric utilities. Public power utilities are located in every state except Hawaii. They collectively serve over 49 million people and account for 15 percent of all sales of electric energy (kilowatt-hours) to end-use customers. Public power utilities are load-serving entities, with the primary goal of providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship.

EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for more than 235 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 65 international electric companies as International Members, and hundreds of industry suppliers and related organizations as Associate Members.

NRECA is the national trade association representing nearly 900 local electric cooperatives and other rural electric utilities. America's electric cooperatives are owned by the people that they serve and comprise a unique sector of the electric industry. From growing regions to remote farming communities, electric cooperatives power 1 in 8 Americans and serve as engines of economic development for 42

million Americans across 56 percent of the nation's landscape. Electric cooperatives operate at cost and without a profit incentive.

An extension of the comment period for this rulemaking is warranted given the scope of the Proposed Rule and its potential impacts on critical energy infrastructure. As the Joint Associations previously have indicated in their November 30, 2022, response to DOE's request for information on the Defense Production Act, currently significant supply chain challenges exist for electric distribution transformers. These challenges have resulted in average lead times increasing to more than a year. This existing and growing backlog of distribution transformer orders has led to an increasing number of project delays and cancellations. Unless this situation is addressed, utilities will be hampered in their ability to restore power following natural disasters and storms, extend new electric service to customers, or support electrification initiatives that are being driven by federal and state policies. The Proposed Rule could exacerbate these challenges and warrants detailed technical and economic analysis of each aspect of the transformer supply chain.

In light of the scope and potential impact of the Proposed Rule, DOE has cause to extend the time for filing comments to ensure it develops a more robust record prior to issuing a final rule. Extending the deadline for comments will provide valuable time for all parties to contemplate, consider, research, and meaningfully respond to the important issues implicated by the Proposed Rule.

Sincerely,

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Mr. Matthew Ring, DOE, Office of General Counsel