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From:	MarkMFairhead@Eaton.com
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To:	Energy - Docket Optical System
Subject:	Docket number 15-BSTD-01; Adoption of 15-Day Language for the 2016 Energy Efficiency Building Standard

In reviewing the above referenced Standard, Eaton would like to propose a change to the Definition of "Low Voltage Dry-Type Distribution Transformer" found in Section 100.1, page 18.   The current definition is "Low Voltage Dry-Type Distribution Transformer is a transformer that has an input of 600 volts or less, that is air-cooled, and that does not use oil as a coolant."

This existing definition does not limit the output voltage, so a step-up transformer, one with 480 volts input and 4,160 volts output, would be included in the above definition.
Also, coolants other than oils could potentially be used as the insulating material surrounding the core of transformers that are not cooled by the natural convection of air around the core and coils. According to the above definition, a transformer that uses any fluid other than oil, i.e. water, would be considered a Low Voltage Dry-Type Distribution Transformer.

Eaton proposes modifying the Definition to read "Low Voltage Dry-Type Distribution Transformer is a transformer that has an input and output of 600 volts or less, that is air-cooled, and that does not use a liquid as a coolant.".

This revised definition incorporates wording from federal document 10 CFR Part 431.192 "Definitions", for both "Distribution transformer" and "Low-voltage dry-type distribution transformer". The federal definition of "Distribution transformer" limits the output to 600 volts or less.

Thank you in advance for your consideration.

Sincerely,

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