


Document Details

Docket ID: DOE-HQ-2015-0017 ☺

Docket Title: Requests for Information: National Power Transformer Reserve *☺

Document File: 

Docket Phase: Request for Information (RFI)

Phase Sequence: 1

Title: Comment on FR Doc # 2015-16784 ☺

Number of Attachments: 0

Document Type: PUBLIC SUBMISSIONS *☺

Document Subtype: Public Comment ☺

Comment on Document ID: DOE-HQ-2015-0017-0001 ☺

Comment on Document Title: Requests for Information: National Power Transformer Reserve ☺

Status: Pending_Post ☺

Received Date: 08/24/2015 *☺

Date Posted: ☺

Posting Restriction: No restrictions ☺

Submission Type: API

Number of Submissions: 1 *

Document Optional Details

Status Set Date: 08/26/2015

Current Assignee: Bacon, Cuttie (DOE)

Status Set By: Adams, Andrea (DOE)

Comment Start Date: ☺

Comment Due Date: ☺

Legacy ID:

Tracking Number: 1jz-8kqm-z80v ☺

Submitter Info

Comment: Tri-State Generation and Transmission Association, Inc. generally supports the joint comments submitted by Edison Electric Institute, American Public Power Association and the

National Rural Electric Cooperative Association. One area of concern for Tri-State that is not completely in alignment with the joint comments has to do with the manufacturing capability, particularly in the United States. Tri-State is concerned that the proposed program could compete for manufacturing capacity and could strain the existing capacity of both domestic and foreign suppliers which would lead to even further increased lead times and higher costs while these units were being procured. As transformer manufacturers business models allow for only the resources necessary to stay cost competitive, this temporary need for workforce could be untrained and lack the skills necessary to maintain the quality required. Additionally, the field installation and testing resources are also limited to only those required to meet market demand so a temporary surge could strain that. If there was a need to install a large number of transformers at a singular time, this lack of resources and transportation constraints could undermine the very purpose of this significant and costly program being considered. While such a program is theoretically feasible, there are significant technical and financial challenges that the industry and the Department of Energy will face implementing a National Transformer Reserve. As the joint comments indicate industry has already developed several key programs that should help minimize future reliability risk and a National Transformer Reserve may not be necessary. *Ⓢ

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Government Agency Type: Ⓢ

Government Agency: Ⓢ

Cover Page:



PUBLIC SUBMISSION

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|--------------------------------------|
| As of: 9/4/15 10:26 AM |
| Received: August 24, 2015 |
| Status: Pending_Post |
| Tracking No. 1jz-8kqm-z80v |
| Comments Due: August 24, 2015 |
| Submission Type: API |

Docket: DOE-HQ-2015-0017

Requests for Information: National Power Transformer Reserve

Comment On: DOE-HQ-2015-0017-0001

Requests for Information: National Power Transformer Reserve

Document: DOE-HQ-2015-0017-DRAFT-0005

Comment on FR Doc # 2015-16784

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General Comment

Tri-State Generation and Transmission Association, Inc. generally supports the joint comments submitted by Edison Electric Institute, American Public Power Association and the National Rural Electric Cooperative Association.

One area of concern for Tri-State that is not completely in alignment with the joint comments has to do with the manufacturing capability, particularly in the United States. Tri-State is concerned that the proposed program could compete for manufacturing capacity and could strain the existing capacity of both domestic and foreign suppliers which would lead to even further increased lead times and higher costs while these units were being procured. As transformer manufacturers business models allow for only the resources necessary to stay cost competitive, this temporary need for workforce could be untrained and lack the skills necessary to maintain the quality required. Additionally, the field installation and testing resources are also limited to only those required to meet market demand so a temporary surge could strain that. If there was a need to install a large number of transformers at a singular time, this lack of resources and transportation constraints could undermine the very purpose of this significant and costly program being considered.

While such a program is theoretically feasible, there are significant technical and financial challenges that the industry and the Department of Energy will face implementing a National Transformer Reserve. As the joint comments indicate industry has already developed several key programs that should help minimize future reliability risk and a National Transformer Reserve may not be necessary.