

**APPENDIX 12B. MANUFACTURER IMPACT ANALYSIS
SMALL BUSINESS INTERVIEW GUIDE**

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Distribution Transformer Energy Conservation Standards Rulemaking Manufacturer Impact Analysis Interview Guide for Small Businesses

1. Are you aware of the US Department of Energy's on-going rulemaking to establish national minimum efficiency standards for distribution transformers?¹ Would you like to be added to the DOE's email database for updates relating to this rulemaking?
2. We are assessing the potential impacts of a potential minimum efficiency standard on small businesses. Is your company a small business (defined as less than 750 employees, including all subsidiaries and parent companies, and employees in all countries where you operate)?
3. Does your company manufacture LV dry-type, MV dry-type, and/or liquid-immersed distribution transformers? How many different kVA ratings and designs do you produce within these three major groupings?
4. Are you familiar with NEMA's TP-1 / the ENERGY STAR voluntary standard? Are any of your products TP-1 compliant? If so, what percent of your sales does this represent?
5. Would a TP-1 standard, mandated by the US DOE (whereby all your competitors would also be required to meet the same standard), cause any burdens on your business?
6. What if the US DOE required an efficiency standard higher than TP-1? Would that change your answer to #5? Please consider costs such as new designs, capital investment, prototype testing, and marketing that might be required.
7. Are there any reasons that a small business such as yours might be at a competitive disadvantage relative to a larger business under mandatory efficiency standards? Please consider such factors as technical expertise, capital budgets, bulk purchasing power for material inputs (e.g., electrical steels), etc.
8. Would the Department's proposed test procedure impose an undue burden on small business (explanation required)?² Please consider such factors as technician time, statistical expertise, reporting burden, etc.

¹ For information on the US DOE's efficiency standards rulemaking for distribution transformers, visit:
http://www.eere.energy.gov/buildings/appliance_standards/commercial/distribution_transformers_anopr.html

² For information on the US DOE's draft test procedure for distribution transformers, visit:
http://www.eere.energy.gov/buildings/appliance_standards/commercial/distribution_transformers_snopr.html