

DG ENTR Lot 8: Ecodesign for Power Cables in Indoor Electrical Installations

Organisation: EDF	Name: Franchet Maud	Date: 04/06/2014
--------------------------	----------------------------	-------------------------

Ref.	Section	Page	Topic	Comment	Proposed change	VITO reply
1	4.2.1	10	production	The study should also consider the problem of energy product resources and the risk of shortage.		Task 3 3.4.2.2 eludes the implication on material use. The impact on resources will be considered in Task 6 and 7 because they are related to the design options and scenarios.
2	4.2.2	13	distribution	The way cables are transported (train, truck, plain, boat) and the distance from the manufacturing plant to the installation place should be integrated in the analysis.	Include greenhouse gas emission due to transport in the environmental analysis and in the economic analysis.	The MEErP EcoReport tool is used to calculate the environmental and corresponding economic impact. See Greenhouse gasses at distribution level in Task 4.
3	4.2.4	19	Improvement option	The 2S scenario can be difficult to apply. Indeed, in order to double the number of cables, more space is needed. This is not always the case.		Indeed, this is mentioned as potential barriers in task 3 section 3.4.2.1 and 3.4.2.3.
4	3.1.5		Parameters related to the building and the loading	I don't agree on the use of an average value of the load factor for all kinds of industry and services. Average values are quite sensitive to outliers data and may not be relevant.	Use values of the load factor that are specific to sector and the use of the cable (ex : one value for the lighting cables of a power plant and another one for the emergency cables of a power plant)	Agreed that there is a big spreading and uncertainty about the average. This will be solved by a sensitivity analysis in Task 6.
5				I'm aware that collecting data is not an easy task, however the fact that most of the data comes from the Copper Institute can raise the problem of the objectivity of the study, in light of a potential conflict of interest.		All stakeholders are invited to provide as much data as possible. The study budget is limited and is therefore primarily based upon results of other studies. 2 surveys are sent during the study to installers and cable manufacturers to collect more information.

6	3.3	39	End of life behaviour	What about the integration of recyclability of the used cables? Some insulator materials are not recyclable XLPE vs HDPE etc ... in particular in light that ECI claims that according to "the International Copper Study.		More info is included in the OVAM study to which a reference will be added.. XLPE is now marked as LDPE (non-recyclable) in the EcoReport tool. PVC is marked as non-recyclable.
7	3.3	39	End of life behaviour	Why not being only PVC? Other kinds of insulators such as used in cables " used in cables "		See previous comment
8	1.1.3	21	First proposed scope of this study	Could it be possible to consider production power plants as "process installations", which are out of the scope as stated in the remark ?		To be discussed and reviewed in Task 7, they are not in the objective objective of intermediate tasks 3-6
9	1.1.3	21-22	First proposed scope of this study	In the paragraph "out of the scope" is it possible to change the point 7 and make it more precise?	"Cables used for all types of power plants"	Text updated 'Cables used for power plants such as PV, Wind,;' Note: To be discussed and reviewed in Task 7.
10	1.1.9.7	41	Conclusion from the first screening	In the paragraph, "There is significant potential for improvement.", how could you justify 45% penetration strategy of S+2 by 2030 ?		This is a first screening and the 45% is an assumption for a scenario. Potential scenarios are worked out in Task7.
11	1.1.8.2	28	Secondary product performance parameter related to the use of the cable	Why having chosen a power factor of 0.8? Is it always the right value, especially for lightning?		This bullet point is explaining the formula listed in IEC 60364-5-52 © IEC:2009. The explanation of the parameters is extracted from this standard. Potentially tariff structures are based on this limits and end users work therefore to this value.