



Lieutenant Governor Austin A. Davis

March 27, 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 Ave. SW
Washington, DC 20585-0121

Dear Secretary Moreno:

I am writing on behalf of the United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) local 3303, regarding the proposed increase in energy conservation standards for distribution transformers. It has been brought to my attention that the Department of Energy has proposed a standard that if imposed will require all transformers to be made from Amorphous Metals by 2027, instead of Grain Oriented Electrical Steel (GOES).

UAW 3303 represents approximately 1500 employees of Cleveland-Cliffs Inc., at two worksites in Butler, Pennsylvania and Zainesville, Ohio, where they manufacture grain oriented electrical steel (GOES) and non-oriented electrical steel (NOES). Cleveland-Cliffs is the sole producer of electrical steel in North America and the GOES that are produced at these facilities are used to build the steel cores in distribution transformers. If the proposed standards go into effect it is anticipated that this company will be faced with mass layoffs, and will ultimately cease to exist.

Additionally, it is important to note that the proposed standards threaten to decimate the market for electrical steel and create national security risks. If the domestic electrical steel industry is weakened our country will become reliant on foreign core materials, further increasing costs to customers, and delaying delivery and project times.

I ask that you consider the implications that this proposed standard will have on the economy, our communities that rely on the safe provision of electric power, and the many UAW 3033 members that help make that possible.

Thank you in advance for your consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "Austin Davis".

Austin Davis

Lieutenant Governor
Commonwealth of Pennsylvania