04 December 2019

CSA Group
Attn: Scott Hall
Project Manager
178 Rexdale Blvd
Toronto ON
M9W 1R3

Dear Scott

**D002 - Photovoltaic Cable Harmonization**

A CANENA trinational harmonization project has been underway for several years now to create a single cable standard for Photovoltaic Cables. In the time that has passed the current Photovoltaic Cables manufactured for the Canadian market to CSA 22.2 No. 271 (e.g. types RPV90 and RPVU90) have been made and used in large quantities and the specifications for the cables and associated connection equipment have become deeply entrenched in the Canadian electrical industry. The products are mature, and it is understood no field reports have been received regarding product standard modifications that might be required due to any particular needs or issues.

A change of the sort envisioned by a new harmonized standard (e.g. a product type name change and changes to performance and dimensional specifications) will be very disruptive. As well managing legacy product issues will be very challenging and the costs of introducing a new standard appear to outweigh any potential benefits.

Therefore, Members of the Canadian Wire & Cable Manufacturing Industry represented by EFC are giving notice of withdrawal of support for the current CANENA harmonization project for Photovoltaic Cables (i.e. Trinational NMX-J-733-ANCE/CSA C22.2 No. 271/UL 4703 Photovoltaic Wire Standard).

EFC Members are willing to engage in discussion concerning this position; please contact me with questions, comments, or for further dialog.

Thank you
Yours truly

[Signature]

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CC
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- Chris Scott – Chair, Wire & Cable Product Section, EFC
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