

ENERGY STAR Enterprise Storage – Draft Specification Framework – Comments from the European Commission

We appreciate the ENERGY STAR Enterprise Storage Draft Specification Framework document and believe it is a good starting point for the specification. We generally agree on the building blocks and the areas covered and questions asked. We look forward to working with the US EPA, the storage industry and other organisations on developing the specification.

We have a number of suggestions for additions to the framework document and the process:

- We suggest to include in the beginning of the document the overall principles of setting requirements especially the target of 25 % qualification levels – also for possible adders – and that criteria should be set according to services delivered and not to technology used.
- The definitions of the operational states are important to further develop. There might be other relevant operational states to include such as maintenance, while other proposed states might be excluded. However, before entering the discussion of the operational states definitions, it should be clarified the approximate differences in energy consumption. E.g. if there is little difference in power consumption between idle and maximum load, no need to use many resources for defining various states at this level.
- Power saving states should be discussed under the operational states. Storage components when idle should as far as possible enter energy saving modes.
- Possible dependence on the connected system (server etc.) should be considered.
- Power management requirements should be included in the specification. Storage will typically be used 24/7 environments where the load is fluctuating very much and where there are long periods with no delivered services to the end user. During these periods, the storage should partly or fully power down.

We and the Member States will provide more detailed comments in the coming process.