



September 24, 2008

Andrew Fanara  
c/o Rebecca Duff (ICF)  
ENERGY STAR Program Manager  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
MC 6202J  
Washington, DC 20460

Dear Andrew:

The Consortium for Energy Efficiency (CEE) appreciates the opportunity to provide comments on the ENERGY STAR Draft 2 Program Requirements for Computer Servers. CEE values its close working relationship with ENERGY STAR and industry stakeholders to develop common energy performance specifications and application guidance for use by member efficiency programs.

The CEE Data Centers and Servers Committee (the Committee), which includes CEE member energy efficiency programs, convened to review this specification. The Committee appreciates that there are many complexities with this product category. When available, the Committee asks that EPA provide to CEE those data and analyses that support the fundamental tenants of the ENERGY STAR program, including:

1. Energy savings ranges for those server categories covered by the specification;
2. Anticipated server market share for those server categories covered; and
3. Cost effectiveness information for those server categories covered.

The Committee supports the proposed ENERGY STAR standard server power and performance manufacturer information submittal requirements. In addition to having the means to anticipate the relative energy savings potential within an ENERGY STAR server category, the Committee agrees that having access to a server's peak power draw (kW) is important for efficiency program purposes.

In addition to the Committee's comments, CEE asks that EPA help to refine our understanding of the duration of time the Tier 1 ENERGY STAR server distinction would be relevant.

The Committee looks forward to working closely with ENERGY STAR to support this process. We would like to thank EPA for the opportunity to comment on the ENERGY STAR Draft 2 Program Requirements for Computer Servers. Please contact CEE Sr. Program Manager, Jason Erwin, at 617-589-3949, ext. 212 with any questions about these comments.

Sincerely,



Marc Hoffman  
Executive Director