

From: Francois Xavier Rongere [fxrongere@sbcglobal.net]

Sent: Saturday, September 20, 2008 2:50 PM

To: Duff, Rebecca M.

Cc: Mark Bramfitt; M5B4@pge.com; Howard, Arthur; Francois Rongere; William Dunkel; Randy Cole

Subject: Comments on the 2nd draft of the Energy Star Server specifications

Hi Rebecca;

Here our comments:

1. We appreciate that EPA takes the lead to drive energy efficiency for computer servers, nation wide.
2. We agree that the industry has not converged yet on an energy performance assessment standard. Nevertheless we want to encourage this effort and consider that the objective as "Tier 2" in the proposal is the final goal. Tier 1, focusing on components, will be a first step in that direction. We also strongly recommend implementing a timeline for Tier 2 as soon as possible.
3. We are glad to have EPA supporting the importance of including Power Factor requirement for power supplies as it has been done by the 80PLUS program. Even if the Power Factor requirements of the numbers are lower than the specifications resulting in ECOS-EPRI work for utilities¹[1], they state the right message to the industry and we support this proposal.

¹[1] ECOS. EPRI

Efficient Power Supplies for Data Center and Enterprise Servers

February 2008. <http://www.etcc-ca.com/database/summary.php?id=467>

Hopefully these comments will not be too late. And, again, thank you very much for your strong leadership in putting these specifications in place.

Best regards,

FX RONGERE

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4. We proposed in our remarks about Draft1 that the cooling fans in the performance be included in the Energy Star specifications. We appreciate the EPA effort to build a consensus approach through the industry. We understand the difficulties of capturing the actual energy efficiency contribution of the fans and consider the Draft2 proposal as a good common field to move forward.
 5. We agree that idle power has to be considered because of the current actual usage of servers in Data Centers. A ceiling to that idle power stated in percentage of maximum operating power of the servers would be a good first step if this can be agreed upon by industry. If no agreement can be reached, we recommend pushing the idle power requirement for the Tier 2 release in order to not delay the Tier 1 release past the January 1, 2009 date.
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