

April 25, 2012

Mr. RJ Meyers
ENERGY STAR® Program Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Meyers:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR Draft Final Uninterruptible Power Supply (UPS) Specification, released by the Environmental Protection Agency (EPA) on April 5, 2012.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. In 2011, CEE members directed \$7.8 billion of energy efficiency program budgets in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as our national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

Meter Credit Should Not Compromise Cost Effective Savings for Customer

In the Draft Final specification, EPA has maintained an efficiency credit of 1% for units >10kW that contain meters. A credit may be acceptable if the fundamental performance level results in defensible, cost effective savings for customers. We ask that EPA share its basis for the 1% credit via an updated energy savings analysis as soon as possible.

Information on expected UPS incremental energy savings, pricing and estimates of ENERGY STAR UPS product market penetration is essential for efficiency program administrators to inform future program incentives or offerings for this equipment category.

CEE would once again like to thank EPA for the opportunity to comment on the ENERGY STAR specification for Uninterruptible Power Supplies, Version 1, Draft Final. Please contact CEE Sr. Program Manager Jason Erwin at 617-312-9269 with any questions about these comments.

Sincerely,

A handwritten signature in blue ink that reads "Ed Wisniewski". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ed Wisniewski
Executive Director