

## ENERGY STAR UPS Specification Draft 2

### Comments from the European Commission

We provide in the following comments from the European Commission to the Product Specification for UPSs Draft 2 Version 1 document. We are happy to see that EPA agrees in many of our previously submitted comments and has adjusted the draft correspondingly.

Line 23 – Application: We support the division of products into these application categories though we believe there is much overlapping between the consumer and small office commercial UPS categories.

Line 163 – Excluded Products: This is fine for us to exclude these product categories as long as they are clearly defined without possibility to misinterpretation. E.g. if a traditional UPS is used for industrial purposes it should not be possible to classify it as “Industrial UPS”. The conditions “...designed to withstand rough handling and abusive environments.” could be interpreted differently by the manufacturers.

Line 215 – Efficiency Requirements: We recommend that the levels should be set at a 25 % and not 30 % qualification level as following the general approach for levels settings for ENERGY STAR specifications. In connection to industry comments on unit-to-unit differences in efficiency, we would like to see more documentation and explanations on why this is a larger problem compared to other product groups.

Line 252 – DC Systems: We are happy to see the inclusion of DC systems and we hope that more manufacturer data will be submitted.

Line 331 – Communication and Measurement Requirements: We believe that there is still a high need to measure and assess energy consumption in datacenters and that a requirement of power measurements and energy efficiency calculation in UPS systems could stimulate a development towards higher energy efficiency focus. The requirement may be for datacenter UPS systems only.