

**ENERGY STAR Draft 3 V1.0 Uninterruptible Power Supply Specification  
Eltek Valere Comments**

Submitted by David Leal, Vice President of Sales,

Energy Star UPS Team:

Eltek Valere would like to provide several comments with respect to Draft 3 of the Energy Star UPS Specification.

Firstly we would like to restate our comment from Draft 2 regarding the 0.955 efficiency requirement provided in table 3. At the August 1 Stakeholders call it was stated that the intent of the DC UPS initiative is to first focus on the 48V systems, which represent the largest volume of applications. We agree with that approach. It does not appear, however, that the efficiency requirement is tied to any particular output voltage. In general, the efficiency of rectifiers tends to decrease somewhat as the output voltage decreases. As an example, the best in class 24V rectifiers are generally about 1% lower in efficiency than their 48V counterparts. If it is your intention to have a single efficiency requirement for all DC UPS, you may want to consider a slightly lower target that would also enable Energy Star rated 24V UPS for cell site applications, which are considerable in number. A reduction to 0.950 would allow the best 24V systems to potentially qualify, and we believe would remain an aggressive requirement at 48 V and meet Energy Star's goals.

Secondly we would like to voice our support for the proposal on providing an efficiency credit for UPS >10kW that are sold with metering in order to allow end-users to accurately monitor their total energy consumption.

Related to this section 3.7 we noted that in clause 3.7.1 line 355 it states 'Ac-output UPS products with output power greater than 10kW may qualify for an additional 2% efficiency credit,.....', we believe that this is a misprint and should cover both Ac-output and Dc-output UPS. This was discussed during the webinar Tuesday, November 8, 2011 and we understood that this was agreed to be updated for the final revision.

We appreciate the EPA's efforts in developing the Energy Star UPS specification, and are available to discuss these matters in further detail as appropriate.