

## ENERGY STAR UPS Specification Draft 3 Comments from the European Commission

We provide in the following comments from the European Commission to the Product Specification for UPSs Draft 3 Version 1 document. We are happy to see that EPA agrees in many of our previously submitted comments and has adjusted the draft correspondingly.

We have only the following few important comments to the draft.

Line 217 – Less stringent efficiency requirement for VFI, P < 1500: The efficiency requirement has been lowered from draft 2 to draft 3. In draft 2 it was 0.97, and in draft 3 it is about 0.87–0.88 (500–1500 W), which is about 10 percent less stringent requirement. We suppose that the data set is the same and that the qualification rate has increased. The note indicates that the price difference between e.g. VFD and VFI was the reason to loosen the requirement. However, we believe that price differences between product types is not a guiding principle for setting the criteria level, only the 25 percent qualification rate. We recommend to reconsider this requirement change.

Line 235 ff – Less stringent efficiency requirement for products with metering and communications capability: We think it is a pity if it should be necessary to loosen the requirement with an additional 2 percent efficiency credit, if the product is sold with an energy meter. We agree that UPS should be sold with a meter, but either it should be required at least for larger UPSs, or the ENERGY STAR partners must inform the customers of the benefits. In the end, we are not sure that the each meter will result in energy savings for the data centre.

If this credit will be maintained, there should be many more requirements to the energy meter and the communication. Right now a simple, cheap and inaccurate energy meter could be bundled with the UPS, which could receive the credit. There should be requirements such as: Electronic reading at least 4 times per hour, minimum accuracy, should have a common communications protocol, if bundled, it should be an easy-to-install meter etc.