

Response from The Green Grid to:

ENERGY STAR[®] Uninterruptible Power Supply Draft 3 Version 1.0 December 2011

The Green Grid Association, a consortium of industry leading companies welcomes the opportunity to comment on the Draft 3 ENERGY STAR for Uninterruptible Power Supplies (UPS). Some member companies of The Green Grid Association may be providing additional considerations highlighted by their industry or company's particular perspective. In addition, the UPS OEM members may have also provided their inputs through NEMA.

Introduction

A consortium of information technology providers, consumers and other stakeholders, The Green Grid Association seeks to improve the energy efficiency of data centers around the globe. The organization takes a holistic and comprehensive approach to data center efficiency and understands that addressing this challenge requires a high-level view of the entire data center and cooperation among a wide range of industry principals. Participants in The Green Grid include such diverse companies as major server and storage equipment manufacturers, leading infrastructure manufacturers, major software providers, and large end-users / data center owners.

Overall

We are delighted with the progress made by the EPA on this specification and greatly appreciate the attention to, and incorporation of, many of the industry's comments on previous outlines and drafts. The Green Grid's feedback is generally referenced against the section numbers listed in the framework document with specific line numbers where practical. We believe the current Draft 3 is relatively close to becoming a final specification and is something that we can support, with only minor adjustments.

The Green Grid membership remains keenly interested in the development of this new ENERGY STAR specification as we believe it will help data center owners, operators, developers, architects and engineers, and purchasing organizations make improved and informed decisions that will help EPA and The Green Grid in our mutual efforts towards reducing total energy consumption per unit of IT workload.

Recommendations and Discussion

Communication and Measurement Requirements

Specifically 3.7.1 Lines 355-360

We are delighted to see the EPA reach out to the manufacturers of UPSs with an inducement for the addition of an output energy meter, which will help the end user community develop an understanding of their PUE (L1). We would like to suggest that in order to reduce cost, and speed time to market, that the EPA include a provision that will enable UPSs manufacturers to receive this credit for any qualifying UPS that provides an energy (in kWh) data output either by a meter or via any standard industry recognized software protocol, such as SNMP, Modbus, etc.

PPDS and Data Reporting Forms

We believe that further work is required on these documents, perhaps even beyond the release of the final draft standard and test method. Ideally, they would continue to be refined until a few products are piloted through the independent Certification Body test and submittal processes and EPA's proposed electronic comparison tool is at least prototyped.

Testing by Independent Parties

Given the volume of information necessary to accurately perform and reproduce UPS efficiency measurements, we recommend that partners be allowed to provide detailed guidance on how to perform testing on particular UPS models in publically available documents other than the user manuals. Ideally links to such documents would be included on the PPDS.

Conclusion

This document is a consensus document that was subject to peer review and comment within the more than 200 member companies of the Green Grid who are stakeholders in data center efficiency. Our members collectively own, operate, or manage over 2,000 data centers globally and as such have a vested interest in the adoption of an internationally recognized standard for UPS energy efficiency. Again, we believe the EPA has made huge strides in the development of this specification and believe it is very close to market ready with a few minor adjustments.