



November 20, 2007

Andrew Fanara  
ENERGY STAR Product Development Team Leader  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Dear Andrew:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following *initial* comments and questions on the ENERGY STAR External Power Supplies (EPS) specification. These comments were developed based on CEE Consumer Electronics Committee (Committee) discussion of the Draft 1 Version 2.0 ENERGY STAR Single-Voltage External Ac-Dc and Ac-Ac Power Supplies Specification issued on October 11, 2007. Thank you for the opportunity to provide input on the draft specification; our intent in submitting them prior to the deadline is to inform discussion at the November 13 Online Stakeholder Meeting. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

#### General Comments and Questions

CEE applauds ENERGY STAR's efforts to increase the efficiency performance levels in the EPS specification given upcoming minimum energy performance standards increases in California and Canada that will exceed the levels in the current specification. It is critical to the continued relevance of the ENERGY STAR brand that specification levels exceed state and national standards. In addition, we support the proposed effective date of July 1, 2008, which is consistent with the effective date of the California standards.

We thank EPA for providing a note in the draft specification that explains how the proposed Active Mode efficiency levels were set. CEE seeks more information at the Stakeholder Meeting about the costs to manufacturers (and potentially end consumers) of complying with the proposed levels. This information would help CEE to further evaluate the proposal.

CEE supports ENERGY STAR's intent to cover approximately 25% of available products with this updated specification; EPA's note in the specification indicates that 26% of models already meet the new levels. We ask that EPA devote time during the Stakeholder Meeting to clarify how this percentage of products was determined, as the Excel data set EPA circulated with the draft specification generated confusion on this point.

#### Power Quality

CEE supports EPA's efforts to coordinate power quality requirements in this specification with other ENERGY STAR and international specifications. We understand that the proposed 0.9 Power Factor at 100% of rated load for EPS with a power output of at least 75 watts is consistent with the ENERGY STAR computer specification. However, it is our understanding that this diverges from EU regulation EN 61000-3-2, which addresses power quality by limiting total

harmonic distortion. We ask that EPA present an analysis of the benefits and costs associated with each approach at the November 13 meeting.

We also request that EPA review its methodology for determining which models will meet the proposed power quality requirements at the Online Stakeholder Meeting. There appears to be inconsistency between EPA's note that 90% of current ENERGY STAR-qualified EPS meet the PF requirement and the Excel data set that EPA circulated with the draft EPS specification.

#### Energy Savings Information

At the Stakeholder Meeting, CEE would also like to learn more about the energy savings that the specification will deliver. EPA notes that the average efficiency improvement will be 3-10 percentage points in Active Mode. CEE requests further information about this range and how it will translated to kWh (and possibly kW) savings in the U.S. and Canada.

Thank you again for the opportunity to comment. CEE looks forward to continuing its participation in this specification revision process as it moves forward. Specifically, we may elect to submit additional comments after the Online Stakeholder Meeting. If you have any questions about these comments, please direct them to Margie Lynch, CEE Program Manager, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman  
Executive Director

#### **Supporting Organizations**

BC Hydro  
Energy Trust of Oregon  
Natural Resources Canada  
Natural Resources Defense Council  
Northeast Energy Efficiency Partnerships  
NSTAR Electric  
NYSERDA  
Sacramento Municipal Utility District  
Southern California Edison  
Wisconsin Focus on Energy