

NRDC Comments on Proposed ENERGY STAR Version 2.0 External Power Supply (EPS) Specification

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On behalf of NRDC's more than 1 million members and e-activists we are writing to extend our support for the March, 2008 revised final draft specification for external power supplies (EPS). As a key player in the development of the test method for measuring EPS efficiency and the author of the memorandum of understanding (MOU) that created the world-wide Roman numeral marking scheme for power supply efficiency, we have extensive experience and ongoing interest in the success of this specification.

We believe the time is right for upgrading the ENERGY STAR requirements for EPS given:

- the recent improvements in available EPS technology which has resulted in higher average efficiency and lower no load power levels, and
- the new mandatory US requirements that were established by the 2007 federal energy bill.

Our comments below contain our thoughts on the most recent draft including some suggestions for improvement in future revisions.

Specification stringency and schedule – Per our review of the available data set, we believe EPA set the active mode efficiency and maximum allowable no load power levels at the appropriate levels. The resultant specification is consistent with EPA's approach of qualifying the top 25% of the market.

We also want to express our support for the proposed effective date of November 1, 2008. This date is particularly relevant given the July 1, 2008 effective date for the federal minimum EPS standards which are set at the current ENERGY STAR levels. As such any further slippage of the new ENERGY STAR effective date will create extended market confusion as there will be no difference between the federal minimum standard and the voluntary ENERGY STAR labeled products that are meant to signify models with greater energy efficiency.

Power factor – EPA added power factor requirements of > 0.9 for power supplies over 100 W rated input power. This is a good start toward addressing an emerging energy savings opportunity in all kinds of electronic devices.

In the next update of the ENERGY STAR specification for EPS, we encourage EPA to consider extending the applicability of its new power factor requirements to lower wattage products. Although the energy savings implications are not currently very well understood, we believe that the large volume of electronic products operating with poor power factor at lower wattages warrants additional investigation.

Efficiency Level Labelling – The international MOU on EPS efficiency labelling establishes a set of tiered performance specifications, each including a specific roman numeral. These levels are available for adoption by interested policy makers around the world and provide an internationally harmonized system for marking and identifying EPS efficiency.

The new EPA ENERGY STAR specification establishes a new performance level and requires a “V” marking on all qualified models. NRDC completely endorses this approach. **The one step that still needs to occur is updating the MOU to reflect the V levels and EPA’s effective date for this level.** NRDC is poised to work with EPA and its contractor ICF to revise this document, have the current signatories sign the updated version, and to make the document readily available to all interested stakeholders for their use.

Data Availability – Consistent with comments NRDC has made in the past, we once again fail to understand why EPA masks the efficiency data it receives from manufacturers. While we are completely sympathetic to the need to keep sensitive information about things like pricing, sales, etc confidential, we don’t see any reason why the model identities are not made available in the EPA’s specification process. For example, what could possibly be confidential or unsuitable for publication about a named model’s energy efficiency or no load power level.

The public interest would be much better served by having access to the company name and model number data. This way all interested stakeholders would be in a position to review the data list and confirm whether it appears representative of the models available on the market. It also provides end product manufacturers with a single location for assessing the efficiency ranges of similar sized models, which can in turn help inform their purchasing decisions. Lastly it provides a baseline from which stakeholders can track future efficiency improvements in the market

No Load Power Levels – While the no load power levels that have been proposed are reasonably stringent, we encourage EPA to track market developments (eg no load levels, pricing, market share, etc.) and consider lowering the no load levels further in future iterations of the specification. We based this recommendation on new technology that is available on the market from component manufacturers like Power Integrations which promise to continue lowering no load power levels, especially for the large volumes of low wattage products on the market like cell phones, portable media players, etc.