



NRDC Comments on ENERGY STAR Computer Specification – March 15, 2006

On behalf of the Natural Resources Defense Council and its more than 600,000 members, we appreciate the opportunity to submit our comments on the proposed revisions to the ENERGY STAR computer specification. Our prior comments expressed our support for EPA's proposal to add idle mode and power supply efficiency requirements to its specification as a means to help reduce the amount of power consumed when a computer is turned on.

In this set of comments, we provide our input on: a) the proposed timeline, b) the power levels set for sleep and standby modes, and c) the criteria used to segment the desktop computer market for establishing idle mode levels.

Timeline

During the February, 2006 stakeholder meeting in Washington, DC some of the computer manufacturers expressed their concerns about the availability of internal AC to DC power supplies that meet the ENERGY STAR computer specification requirements. The representative from Dell Computer stated during his presentation that: a) their company is not opposed to the 80% efficiency requirement, and b) they need a total of more than 500 days to qualify a new power supply model. As such, they requested a one year delay in the proposed effective date of the specification. (Note, EPA proposed an effective date of January 1, 2007, and the computer makers asked for January 1, 2008.)

We believe an additional year long delay in the effective date of the spec is unwarranted and unnecessarily long for the following reasons:

- Complying power supplies are already commercially available from multiple power supply manufacturers and we expect more companies to bring new models to the market to meet the demand created by the upcoming ENERGY STAR specification and the rebate programs being offered by some of the leading utilities across the country in 2006.
- We respectfully challenge the timeline presented at the meeting that showed a more than 1.5 year time line to qualify a replacement component, such as an energy efficient power supply, into the supply chain. This contradicts the public statements frequently made by the electronics industry at regulatory forums of the rapidly changing nature of their business and the

relatively short shelf lives of their offerings. In addition, the industry has known for quite some time about the probable requirement for more efficient computer power supplies as part of ENERGY STAR's revised specification.

- The ENERGY STAR specification is grossly in need of revision as close to 100% of all desktop computer models currently qualify for the label . In addition, most of the savings being produced by the current specification are only “paper savings”. This is due to the fact that the current specification does not address active mode power use and the majority of users choose to disable the power management features responsible for providing the energy savings.

As we appreciate the support Dell and other companies stated for the efficient power supplies requirement and recognize the need for give and take in these specification setting processes, NRDC believes a three to six month extension provides a reasonable compromise for all parties. This would move the program effective date somewhere between April 1 and July 1, 2007. This timeline provides additional time to address the potential sourcing issues that were expressed during the meeting and will help ensure that qualifying products reach the marketplace in time for the high volume back to school selling season and end of fiscal year purchases made by the government and other institutions.

SLEEP/STANDBY MODE LEVELS

We concur with the industry presentations made at the meeting that one needs to set the sleep and standby levels at the right levels to ensure computers, in particular those in a networked institutional office setting, utilize the power management features and as such go to sleep during extended periods of inactivity and are turned off at the end of the day.

While we do not have a specific alternate target level, we are sympathetic to proposals to increase slightly the proposed levels for sleep and standby levels if they will increase the likelihood of computers using power management. From a systems point of view, the few Watts of savings one gives up will be dwarfed by the incremental savings that would be gained by increasing the % of computers utilizing power management and its lower power modes.

We encourage EPA to facilitate a conference call of interested parties, including Microsoft, to explore this issue further. One approach would be to set the slightly higher sleep and standby levels in Tier 1 and then to revisit this issue prior to finalizing Tier 2. At that time, one could get a better sense of power management enabling rates and also understand the impacts of the new Vista operating system that will have been rolled out by Microsoft.

DESKTOP COMPUTER SEGMENTATION

During the specification setting process, it became clear that some form of segmentation would be desirable to differentiate less powerful computers from those that deliver greater capability. The more “high end” computers, for a lack of a better term, would be eligible for a slightly higher idle mode power limit.

The original thought, which was generally rejected, was to use chip clock speed as the proxy for segmenting the market. At the 11th hour it was suggested that the benchmarking software tool SPEC should be used.

We encourage EPA to continue its exploration of SPEC benchmarking for this purpose. If this appears viable, then the industry needs to work rather quickly to develop a consensus proposal for what SPEC score to use as the cutoff to break the desktop market into two. To minimize testing and reporting burdens on the industry, the default could be that the computer is considered a basic computer and be subject to the lower idle power budget. Only those manufacturers/resellers who want to claim eligibility for the higher idle mode power level would have to perform this testing.

Given the lack of progress made by various industry led working groups that were formed during the spring 2005 meeting, we urge EPA to proactively manage this process and to avoid this currently unresolved topic from slowing down finalization and roll-out of the overall specification.

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In closing, we want to commend the EPA for the open process it continues to use to revise its computer specification. We remain available to participate in subsequent conversations needed to close out this specification, and look forward to a highly successful roll-out during the first half of 2007.

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