



October 13, 2006

Katharine Kaplan Osdoba
ENERGY STAR Marketing Manager
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
MC 6202J
Washington, DC 20460

Dear Katharine:

On behalf of CEE, I am submitting the following comments on the ENERGY STAR computer criteria. These comments were developed by the CEE Electronics Committee (Committee) in response to the Final Draft of the ENERGY STAR Program Requirements for Computers issued on September, 22 2006. We have kept our comments at a high level and have confined them to topics with which we are familiar. We may submit more technical and specific comments during future revisions as our work on electronics expands and we develop more expertise in the product area. The organizations listed at the end of this letter have chosen to indicate their support for these comments.

General Comments

CEE commends EPA on its efforts to revise the ENERGY STAR computer criteria to bring them up to date with the current computer technology and market. With the increasing prevalence of computers in businesses and homes, and their increasing use and capability, computer energy efficiency will likely become more important to CEE member efficiency programs in the future. In particular, CEE supports EPA's decision to set the operational criteria for computers at such levels as to allow for approximately 25 percent estimated market penetration of ENERGY STAR products. This 25 percent level is consistent with ENERGY STAR's approach across a variety of product areas, and has generally been shown to garner measurable energy savings.

Internal Power Supply Requirements

CEE supports EPA's inclusion of an 80 percent minimum efficiency requirement for internal power supplies at 20 percent, 50 percent and 100 percent of rated output, and a power factor requirement of greater than 0.9 at 100 percent of rated output, in the revised ENERGY STAR computer criteria. Many CEE members participate in the 80PLUS program, whose primary goal has been to achieve at least this 80 percent level of efficiency, and CEE applauds EPA's decision to leverage their work. The inclusion of an 80 percent minimum efficiency requirement for internal power supplies in computers will result in significant energy savings, and will help to transform the internal power supply market.

External Power Supply Requirements

CEE supports EPA's decision to require ENERGY STAR or equivalent external power supplies for computers that use these products. Such brand consistency is critical to the success of the ENERGY STAR program. We also support EPA's efforts to leverage existing ENERGY STAR

resources, though we do not have specific comments on the technical merits of the external power supply specification at this time.

Thank you again for the opportunity to comment. The Committee looks forward to the release of the final criteria shortly. If you have any questions about these comments, please direct them to Erica Schroeder, CEE Program Associate, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

BC Hydro
Efficiency Vermont
National Grid
Natural Resources Canada
New York State Energy Research & Development Authority
Northeast Energy Efficiency Partnerships
Northwest Energy Efficiency Alliance
Pacific Gas & Electric
Sacramento Municipal Utility District
Southern California Edison