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Electric Company®



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October 2, 2019

Mr. Ryan Fogle  
ENERGY STAR Program – Product Labeling  
U.S. Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Subject: Version 8 ENERGY STAR Computer Specification Final Draft Comments

Dear Mr. Fogle:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the United States (U.S.) Environmental Protection Agency's (EPA) request for further information on desktop computer categorization.

The signatories of this letter, collectively referred to herein as the California Investor Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western U.S., serving over 32 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of the products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate this opportunity to provide comments to EPA as it develops the ENERGY STAR® Computer Specification Version 8. This letter outlines comments regarding the Final Draft of the Specification.

The CA IOUs support the EPA's effort to recognize efficient computers on the market, and support some of the updates proposed in Version 8. In particular, we support:

- **Updated adders based on new mode weightings** – The adders proposed in Draft 2 reflect the new mode weightings and maintain the relative proportions of base allowance and adders in the total energy consumption (TEC) allowance of the prior Version 7.1 Specification.
- **Adding ten percent load efficiency requirement** – The CA IOUs support the addition of a ten percent load requirement for internal power supplies and encourage EPA to continue to push the market toward increasing low-load efficiency in future versions of the specification.
- **80 Plus Gold equivalent efficiency requirements for power supplies greater than 500 watts** – The CA IOUs encourage EPA to continue to evaluate cost-effectiveness of power supplies and increase stringency for smaller supplies when shown to be cost-effective.

The CA IOUs have noted some areas to improve the specification in previous comments that have not been incorporated into the Final Draft.<sup>1</sup> To continue ENERGY STAR's history of recognizing energy efficient products, we recommend that EPA revisit the following topics in the next specification revision cycle:

1. **EPA should reduce pass rates to anticipate U.S. market improvement and maintain relevance in states that have adopted the California Energy Commission (Energy Commission) standard.**

EPA should anticipate market improvements and set requirements that target a maximum 25 percent pass rate of systems sold on or after the effective date of the new specification version. CA IOU analysis of systems available for sale in California shows that 51 percent of desktops, 49 percent of integrated desktops, and 94 percent of notebooks would pass Version 8. If ENERGY STAR is to maintain relevance in markets that have adopted the Energy Commission standard and anticipate changes in the U.S. market as a result of greater market share of efficient products, pass rates must be reduced significantly.

2. **EPA should require mature energy savings technologies and eliminate incentives for designs that should be saving energy.**

The CA IOUs disagree with EPA's decision to delay requiring Energy Efficient Ethernet (EEE) to be enabled by default until Version 9. This mature technology saves energy, is easy to implement, and should be standard in efficient designs. In addition, CA IOUs encourage EPA to critically evaluate the full network connectivity incentive. CA IOU analysis identified a number of systems that can pass Version 8 without the incentive, indicating that the incentive is no longer required.

3. **EPA should create allowances for a new product feature only once an efficient implementation exists.**

As new technology and features are developed and first implemented, they are rarely designed for optimum energy efficiency. This consideration comes later in the design cycle, as the feature becomes more mature and widely adopted. Yet, industry tends to ask for new allowances for new features before they are common on the market and before energy savings opportunities can be examined. In Version 8, for example, EPA has added large TEC allowances for Ethernet ports with throughput speeds greater than one gigabit per second (Gb/s): a 4.0 kilowatt-hours per year (kWh/yr) adder for systems with an Ethernet port capable of more than one but less than ten Gb/s, and an 18.0 kWh/yr adder for systems with an Ethernet port capable of ten Gb/s. These adders are based on industry information on expected power requirements for these emerging functions, rather than the power required to implement these functions efficiently. Attaching the ENERGY STAR label to products with new features that have not yet been designed for efficiency is misleading to the consumer and does not encourage manufacturers to prioritize efficient design practices. EPA should instead wait for a feature to become available, evaluate the need for an allowance for an *efficient* design, and introduce an adder proportional to the power requirements of the efficient design, if necessary.

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<sup>1</sup> For more details, see IOU comment letters regarding Draft 1: [https://www.energystar.gov/sites/default/files/CA%20IOU%20Comments\\_9.pdf](https://www.energystar.gov/sites/default/files/CA%20IOU%20Comments_9.pdf), and Draft 2: [https://www.energystar.gov/sites/default/files/CA%20IOU%20Comments\\_10.pdf](https://www.energystar.gov/sites/default/files/CA%20IOU%20Comments_10.pdf).

The CA IOUs thank EPA for the opportunity to be involved in the ENERGY STAR Computer Specification Version 8 development process, and we look forward to discussing how the suggestions above may be incorporated into future versions.

Sincerely,



Patrick Eilert  
Manager, Codes & Standards  
Pacific Gas and Electric Company



Michelle Thomas  
Manager, Energy Codes & Standards and ZNE  
Engineering Services  
Southern California Edison



Kate Zeng  
ETP/C&S/ZNE Manager  
Customer Programs  
San Diego Gas & Electric Company