

Final Draft Version 8.0 Computers Specification Comment Summary

Topic	Subtopic	Stakeholder Comment Summary	EPA Response
General	Certification	One stakeholder requested that EPA allow them to provide input on any language shared with Certification Bodies regarding retesting for Version 8.0 certification.	EPA released the Version 8.0 QPX for stakeholder review on 9/19/2019.
General	Overall Pass Rate	<p>Two stakeholders submitted comments regarding EPA's methodology for setting requirements reflective of the top 25% of models available on the market.</p> <p>One stakeholder requested that EPA reassess its guiding principles regarding targeting an overall pass rate to include an analysis of product shipments and suggested that EPA engage in discussion with industry on this point prior to the next specification revision. Industry also provided an analysis comparing the ENERGY STAR Qualified Product List pass rate with the overall market pass rate.</p> <p>Another stakeholder recommended that EPA anticipate market improvements in the 9 months between finalizing specifications and their taking effect, including taking into account the effect of states adopting the California Energy Commission standards on the overall market. They suggested that pass rates at the time of specification should be reduced significantly to account for these future improvements.</p>	EPA has targeted the top quartile of products in the ENERGY STAR dataset in the Final Draft specification. As noted in the ENERGY STAR Guiding Principles, experience has shown that it is typically possible to achieve the necessary balance among the key principles of the program by selecting efficiency levels reflective of the top 25% of models available on the market when the specification goes into effect. These principles include ensuring national energy savings, maintaining product performance, reasonable payback period for consumers, and effectively differentiating products for consumers with the ENERGY STAR label.
General	Qualified Products List	One stakeholder requested that EPA provide an opportunity for public comment regarding revisions to the ENERGY STAR Qualified Products List (QPL). They further indicated that certain revisions to the QPL that clarified the calculation of relevant allowances would assist with industry analysis and accelerate industry response times during comment periods.	The ENERGY STAR certified product list will look very similar to the certified product list used for Version 7.0 as this is the public facing list rather than the list utilized for specification development purposes. EPA understands the stakeholders concern regarding the ability to do certain calculations during the specification revision process and looks forward to speaking with stakeholders on how to make the dataset as usable as possible for the Version 9.0 specification development process.
Allowances	Full Network Connectivity	<p>One stakeholder encouraged EPA to re-evaluate the full network connectivity incentive, suggesting that it may no longer be required as a number of systems were able to meet the proposed Version 8.0 requirements without applying the incentive.</p> <p>Another stakeholder expressed support of the full network connectivity incentives proposed in the Final Draft specification</p>	The intent of the full network connectivity allowance is to encourage the adoption of more efficient product behavior that would otherwise not be adopted as quickly by products, which are not optimized for battery life. EPA looked at the savings garnered by incentivizing many more models to maintain a connection in a low power mode versus the cost of giving these models an incentive. EPA concluded that it is worthwhile to maintain the incentive.
Allowances	General	One stakeholder expressed support of the addition of the internal power supplies ten percent load requirement and encouraged EPA to further pursue low-load efficiency in future versions of the specification.	EPA thanks stakeholders for their support.
Allowances	Internal Power Supplies	One stakeholder supported the inclusion of 80 Plus Gold equivalent efficiency requirements for large internal power supplies and requested that EPA increase internal power supply efficiency requirements for power supplies less than 500 watts in future versions should higher performance become cost effective.	EPA will continue to monitor the progress of IPS efficiency in future revisions.
Allowances	New Features	One stakeholder requested that EPA wait to include allowances for new power-consuming features until efficient implementations of such features emerge and it is possible to set allowances that differentiate such efficient implementations. They further cautioned EPA against setting adders based on industry information for expected power requirements for new features that may be significantly higher than the power needed to implement such features efficiently.	EPA received information suggesting that adders for new technologies such as higher speed Ethernet ports primarily impact high end content creation products which have low shipments but are important for federal procurement. As such, EPA wants to ensure that purchasers have sufficient choice in efficient computing products for content creation. EPA will collect energy use associated with these new features and adjust adders in the next revision if needed.

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Allowances	Touch Technology	One stakeholder requested that EPA implement an allowance for touch technology equivalent to that provided in the ENERGY STAR Displays Version 8.0 specification.	EPA reviewed the products listed in the dataset and found that nearly half of the products that meet the proposed Version 8.0 requirements have touch functionality and meet the requirements without the need for an adder. EPA does not believe that the touch adder used in the ENERGY STAR display specification is appropriate to the entire integrated desktop product, as the display represents only a part of the product's overall energy use. Additionally, EPA does not understand why integrated desktops require this adder when notebooks and slate/tablets in the ENERGY STAR program do not, despite being subject to more stringent energy requirements.
Base TEC Allowances	Category 1 Integrated Desktops	One stakeholder indicated that the Final Draft base TEC allowance for category 1 integrated desktops were not sufficient for many products in that category and would thus force manufacturers to add components to platforms in order to meet the ENERGY STAR requirements. Industry requested that EPA reassess the base TEC requirements for this category and provided a proposal for such revisions.	EPA thanks stakeholders for their additional feedback, but has determined that it does not serve program goals to accept the proposed iDT1 base allowance with a change to the switchable graphics allowance for Integrated Desktops. Over the past months, it has been EPA's understanding from industry that the need to break out iDT1 and iDT2 was rooted in the need to isolate those products from other desktops due to their use of notebook components, which use less energy than those for traditional desktops. This proposal appears to contradict this feedback and the efforts undertaken by the Agency and industry to date. In addition, EPA notes that in its research for this specification, that switchable graphics tend to predominate in computers with notebook components, argues against this change to the adder structure. Finally, EPA noted that when the storage adder was adjusted as part of the Final Draft, iDT1 was not impacted, which would also indicate that most products in that product class utilize notebook components. The Agency does not believe that there is as high a risk for unintended consequences, given that the representative model submitted for testing, by definition, would already be the highest energy consuming product and that roughly half of the products are single products submitted to ENERGY STAR.
Required Capabilities	Energy Efficient Ethernet	One stakeholder expressed discontent with EPA's decision to delay requiring that Energy Efficient Ethernet be enabled by default until the Version 9.0 specification, and argued that the technology was sufficiently mature to be required.	EPA shares the goal of having all EEE ports enabled as-shipped as soon as possible, but given the current state of the market, the Agency is not comfortable removing nearly 1/3 of products which otherwise meet the Version 8.0 requirements due to this single issue. EEE is now required to be present in all 1Gbps or faster Ethernet ports in Version 8.0, with the expectation that all will be enabled in all products in Version 9.0.
Considerations for Future Revisions	Notebook Mode Weightings	One stakeholder suggested that EPA indicate its intent to implement new mode weightings for Notebooks in the next version of the specification in the Consideration for Future Revisions section.	EPA thanks stakeholders for their feedback and anticipate adopting the new mode weightings for notebooks in Version 9.0 if market conditions permit at that time.