



Ryan Fogle, Manager
ENERGY STAR for IT and Data Center Products
US Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

April 28, 2017

Mr. Fogle,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program to the proposed updates to the Uninterruptible Power Supply (UPS) 2.0 Draft 1 specification. After review of the proposal, NEEP respectfully submits the following comments.

In general, NEEP is in support of this undated specification. The UPS market is growing, especially as consumers become both more concerned around grid reliability and the frequency of weather disruptions to the grid increase. ENERGY STAR is a critically important federal program created with bipartisan support that annually delivers billions of dollars of energy savings to consumers and business alike,¹ and is well suited to help guide the efficiency of this product category through specification and certification.

NEEP is supportive of the proposed increases in efficiency in V2.0, though echoes concerns voiced by other efficiency organizations such as NEEA and NRDC that there does not seem to be an explanation for the efficiency levels to go down for VF and VI products rated over 10,000W. NEEP seeks clarification and/or adjustments to this.

One area that NEEP feels would strengthen the specification for consumers and efficiency alike is regarding the testing and reporting levels for lower load points for all UPS classes. That information would be critically important to inform the next version of the specification, especially as the market trend expectation is that, particularly for VFDs, UPS may be used more often at the lower load points than what is tested now. When at one time a UPS would be a back-up system only for the most tech-savvy homes with considerable loads that would likely pull 25-100% of the UPS load, thanks to the great efficiencies gains made by consumer electronics as well as the increased use-cases for UPS, it is likely that now in an UPS use-case, more time may be spent drawing a load of 0%, 5%, or 10%. As such, it is our recommendation that EPA begin to test and report the efficiency levels at those lower load points to determine if there is a potential for additional savings for future specification updates. This slight addition to the testing requirements should have a minimal impact on the manufacturer testing

¹ <https://www.energystar.gov/buildings/about-us/facts-and-stats>



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burden, and the benefits of this information to help better inform consumers and allow them to make an educated decision about the efficient product that would best fit their needs.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP to provide comment to the UPS Specification revision. ENERGY STAR is and must continue to serve in a role of a leader in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR's efforts into the future. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', written over a light blue horizontal line.

Claire Miziolek
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