



KYLE PITSOR

Vice President, Government Relations

June 1, 2017

VIA EMAIL TO: ups@energystar.gov

Mr. Ryan Fogle
Environmental Protection Agency
ENERGY STAR UPS Program Manager
1200 Penn. Ave NW 6202J
Washington, DC 20460

**NEMA Comments on ENERGY STAR® Program Uninterruptible Power Supplies (UPS)
Draft Specification 2.0**

Dear Mr. Fogle,

As the leading trade association representing the manufacturers of electrical and medical imaging equipment, the National Electrical Manufacturers Association (NEMA) provides the attached comments on the Environmental Protection Agency's ENERGY STAR® Uninterruptible Power Supplies (UPS) Draft Specification 2.0. These comments are submitted on behalf of NEMA Power Electronics Division Member companies.

NEMA, founded in 1926 and headquartered in Arlington, Virginia, represents nearly 400 electrical and medical imaging manufacturers. Our combined industries account for more than 350,000 American jobs and more than 6,500 facilities across the U.S. Domestic production exceeds \$117 billion per year. Please find our detailed comments attached.

Our Member companies count on your careful consideration and we look forward to an outcome that meets their expectations. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor".

Kyle Pitsor
Vice President, Government Relations

NEMA Comments on ENERGY STAR® Uninterruptible Power Supplies (UPS) Draft Specification 2.0

1. NEMA understands that the UPS market has been transforming and that to represent the top quartile of products the ENERGY STAR UPS program may need to adjust its minimum performance requirements. Furthermore, we understand that the recently completed changes to UPS definitions and test procedures oblige the EPA to update other aspects of the program. NEMA is concerned that the EPA is moving too quickly and too aggressively with respect to elevated requirements and their implementation timeline.
2. The proposed implementation timeline for v2.0 requirements is too aggressive. Besides elevating program requirements above those of v1.0, the EPA apparently wants to establish some minimum performance level above national minimum standards established by the U.S. Department of Energy (DOE). NEMA notes, however, that national minimum energy conservation standards for UPS products are not yet finalized by the U.S. DOE. NEMA has requested the DOE to revisit these requirements prior to finalizing standards. It follows that if new national standards are not yet established it is not possible to gauge the impact of the ENERGY STAR UPS draft v2.0 specification on product availability and selection. To minimize the negative impact on product selection and availability from simultaneous changes to EPA and DOE standards, we propose the EPA use a two-year implementation timeline for v2.0 requirements and that the two-year period begin on the date that DOE standards for UPS are finalized and formally published. It follows that v2.0 cannot be finalized, or its impact understood, until the DOE UPS rulemaking is concluded. We therefore request EPA to allow at least one more public comment period for the v2.0 UPS requirements after the DOE UPS standards are finalized and published. This precludes manufacturers having to redesign twice; once to ENERGY STAR UPS v2.0 and again to the DOE UPS standards. While one might argue that the ENERGY STAR specification is expected to exceed DOE's, there is no guarantee that DOE's final standards will not be out of sync with ENERGY STAR for some reason, which would oblige the EPA to issue v3.0 which would further confuse and burden the market.
3. During the presentation of the draft v2.0 specification requirements it was observed by EPA and its supporting staff that they believe the national market to be almost 100% saturated with ENERGY STAR UPS. Based on data available to industry, we know this is a mistaken and inaccurate conclusion. NEMA members make numerous UPS models that have not been submitted for certification to ENERGY STAR. It is incorrect to state that ENERGY STAR UPS products account for 100% of the market. NEMA's recent discussion with DOE staff indicates that they share this view as well. NEMA conducted a survey of member product lines to better illustrate this situation and concluded that NEMA member ENERGY STAR UPS products have a penetration of about 72.5% of the market. Externally, a comparison of UL, CSA and ETL listings of manufacturers who have sought safety certification for UPS products indicate that manufacturers participating in the ENERGY STAR UPS program represent only 11.2% of the total number of companies selling UPS in the United States. Additionally, a review of U.S. Customs import information for UPS categories indicates a dramatically larger number of

imports than those qualified to ENERGY STAR (61.9M units vs. 3.1M¹). The Customs data may include switch-mode power supplies to some degree due to the broad classification scope used by Customs, but the huge difference in the figures begs further investigation. Excel files for the aforementioned NRTL listings and Customs data are attached. We are not able to release NEMA member UPS shipments data beyond what is already reported to EPA annually.



UPS Makers Listed US Imports of UPS
UL_CSA_ETL May20:Units May 2017.xlsx

4. It follows that if EPA does not have an accurate picture of the scope breadth of UPS models being sold in the U.S. along with their related energy efficiency levels, then the EPA is not making an informed decision with respect to how high to elevate the UPS specification's performance requirements so as to have ENERGY STAR products represent the top 25% of the market. We propose EPA study this issue in greater detail through examination and survey of representative products. NEMA is willing to assist as able in this investigation. With respect to available market reports, we observe that the two leading reports for the UPS market differ in their findings by a factor of 2. We submit that until the EPA has a more clear understanding of the true scope and content of the national UPS products market, an accurate decision as to where to top 25% lies cannot be made.
5. Regarding the proposed energy efficiency levels proposed in the v2.0 specification, we believe these are too high. As we note in the preceding two comments, the data from the ENERGY STAR program today does not represent the entire market. If the EPA sets a limit in the top quarter of their incomplete data set, the result can only be too high. A proper survey and examination of products which represent the portions of the UPS market which are not participating in ENERGY STAR will enable the EPA to make a more informed and accurate decision. Our review of the qualified products list leads us to suspect that it contains systems either marked inappropriately by class (VI, VFD, VFI) or with data that is inappropriate to its class. We suggest ENERGY STAR review the qualified products list, and eliminate the contentious entries before engaging in the next round of evaluation.
6. An area where the proposed v2.0 energy efficiency levels definitely cannot be justified is for VFD products >1500W. There are no products listed today that meet this proposed level. NEMA questions the appropriateness of creating requirement levels were products do not exist. Similarly, there appear to be no future-compliant products in VI >500kW compared to the proposed v2.0 level. We cannot propose alternate performance levels at this time, owing to the insufficient industry information as noted in item 5. We ask the EPA to present its data which supports these proposals or withdraw them.

¹ EPA Unit Shipment Data for 2015:

https://www.energystar.gov/ia/partners/downloads/unit_shipment_data/2015_USD_Summary_Report.pdf?9a32-6687

Conclusion: From our conversations, the EPA's recent webinar, and the proposed standards, there is insufficient information behind the assumptions and conclusions in the v2.0 draft and NEMA concludes the EPA does not have an accurate, useful data set which clearly demonstrates the national market for UPS products. Furthermore, imminent national UPS Minimum Energy Conservation Standards are not known. These two items are critical to the decision making process and the EPA cannot make an informed, accurate decision on how to influence continued U.S. market transformation until these necessary events are completed.

We are faced with a significant dilemma: arguably the data available is uncertain at best and unrevealing at worst; the DOE and ENERGY STAR market reports differ by a factor of 2; substantially more UPS manufacturers exist than are listed in the EPA ENERGY STAR qualified products list from the NRTL reports developed by NEMA; and U.S. Government import information we have reviewed paints a substantially different picture than the market penetration of 100% assumed in ENERGY STAR's UPS v2.0 documentation. NEMA and its members are concerned that insufficient marketplace information exists to draw a clear conclusion as to whether the need for a new EPA ENERGY STAR standard exists. The only clear conclusion that can be made is that significant further study is required. Coupling this uncertainty with an as-yet-unknown outcome with respect to UPS minimum efficiency performance standards from the Department of Energy, one must conclude that the timeline proposed by ENERGY STAR for a new specification is too optimistic. NEMA continues to support the beneficial market influence of the ENERGY STAR UPS program and we look forward to working with the EPA to improve it, developing and implementing revised UPS specification requirements when their appropriateness and accuracy are more assured.

**UPSunits: First Unit of Quantity by HTS Number, Country Name and First Unit of Quantity
for ALL Countries**

U.S. Imports for Consumption

Annual + Year-To-Date Data from Jan - Mar

HTS Number	Country	Quantity Description	2013	2014	2015	2016	2016 YTD	2017 YTD	Percent Change YTD2016 - YTD2017
			In Actual Units of Quantity						
8504406001	Argentina	number	0	0	0	0	0	1	N/A
.	Australia	number	1,653	2,194	1,854	88	0	0	N/A
.	Austria	number	103	59	0	23	0	0	N/A
.	Belgium	number	4	0	689	0	0	0	N/A
.	Br Indian O Ter	number	100	20	0	0	0	0	N/A
.	Brazil	number	0	36	341	34	22	0	-100.00%
.	Canada	number	4,450	6,893	3,626	1,629	291	387	33.00%
.	China	number	5,450,027	4,685,849	3,931,165	3,419,764	859,467	809,682	-5.80%
.	Colombia	number	0	0	2	0	0	0	N/A
.	Czech Republic	number	10	10	130	48	0	24	N/A
.	Denmark	number	95	260	362	0	0	0	N/A
.	Dominican Rep	number	1,350	0	0	220	220	0	-100.00%
.	Finland	number	15	5	7	14	0	0	N/A
.	France	number	91	26	14	178	94	34	-63.80%
.	Germany	number	9,700	11,386	7,119	6,704	253	545	115.40%
.	Greece	number	89	2	0	0	0	0	N/A
.	Hong Kong	number	21,221	113,274	145,297	65,123	25,919	533	-97.90%
.	Hungary	number	844	754	882	1,097	244	394	61.50%
.	India	number	35,845	29,253	33,245	36,184	13,583	7,450	-45.20%
.	Indonesia	number	7,214	24,041	10,711	1,484	744	87	-88.30%
.	Ireland	number	11,012	6,820	7,874	5,093	1,573	931	-40.80%
.	Israel	number	507	759	876	644	36	164	355.60%
.	Italy	number	1,579	1,771	9,021	10,430	1,324	560	-57.70%
.	Japan	number	366,735	301,791	395,765	266,656	47,694	59,947	25.70%
.	Korea	number	6,866	3,560	8,606	8,014	6,752	349	-94.80%
.	Luxembourg	number	0	3	0	0	0	0	N/A
.	Macao	number	0	0	0	1	0	0	N/A
.	Malaysia	number	101,569	125,249	290,071	229,582	57,169	60,044	5.00%

.	Mexico	number	12,205	20,289	18,094	21,188	4,255	1,666	-60.80%
.	Netherlands	number	8	1,498	101	411	8	0	-100.00%
.	New Zealand	number	530	0	25	129	0	0	N/A
.	Norway	number	1,836	35	28	20	0	0	N/A
.	Philippines	number	42,134	70,638	99,825	106,351	31,791	15,207	-52.20%
.	Poland	number	5	152	2	26	0	0	N/A
.	Romania	number	0	789	1,498	5,105	1,698	680	-60.00%
.	Russia	number	0	0	2	0	0	0	N/A
.	Saudi Arabia	number	0	0	0	2	2	0	-100.00%
.	Singapore	number	1,827	527	7,252	1,436	967	330	-65.90%
.	Slovak Republic	number	56	68	737	457	54	329	509.30%
.	Slovenia	number	0	0	0	1	0	0	N/A
.	South Africa	number	0	0	15	0	0	0	N/A
.	Spain	number	3	22,649	213	0	0	0	N/A
.	Sri Lanka	number	50	10	0	1,003	0	339	N/A
.	Sweden	number	51	517	114	3	0	0	N/A
.	Switzerland	number	152	18	17	451	5	3	-40.00%
.	Taiwan	number	974,546	783,094	550,123	403,114	100,656	95,595	-5.00%
.	Tajikistan	number	0	0	0	97	0	0	N/A
.	Thailand	number	63,140	85,816	103,628	121,330	25,685	9,995	-61.10%
.	Tunisia	number	0	0	375	1,456	660	0	-100.00%
.	United Kingdom	number	6,364	269	1,942	554	166	883	431.90%
.	Vietnam	number	574	6,000	8,724	20,223	7,086	2,176	-69.30%
8504406007 POWER SUPPLIES SUITABLE FOR PHYSICAL INCORPORATION INTO AUTOMATIC DATA PROCESSING MACHINES, WITH A POWER OUTPUT EXCEEDING 50W BUT NOT EXCEEDING 150W	Australia	number	46	0	5	0	0	0	N/A
.	Austria	number	61	48	38	14	8	0	-100.00%
.	Belgium	number	0	1	105	0	0	0	N/A
.	Brazil	number	1	0	0	0	0	0	N/A
.	Cameroon	number	0	22	0	0	0	0	N/A
.	Canada	number	3,376	7,841	9,314	2,749	876	18	-97.90%
.	Cape Verde	number	0	0	0	207	0	0	N/A
.	China	number	7,169,713	8,127,154	6,029,353	4,771,991	1,234,681	1,009,589	-18.20%
.	Czech Republic	number	156	47	1,124	879	318	33	-89.60%
.	Denmark	number	48	51	1	117	0	0	N/A
.	Dominican Rep	number	0	0	0	1	0	0	N/A
.	Finland	number	2	171	13	0	0	0	N/A
.	France	number	230	5	11	241	0	36	N/A
.	Germany	number	2,400	1,284	341	169	11	27	145.50%
.	Hong Kong	number	75,732	15,538	41,951	26,822	1,335	1,600	19.90%
.	Hungary	number	50	17	55	63	17	29	70.60%

.	India	number	1,689	9,069	1,545	4,671	645	142	-78.00%
.	Indonesia	number	554	143	172	10	0	0	N/A
.	Ireland	number	1,130	870	946	951	187	356	90.40%
.	Israel	number	49	14	44	19	5	0	-100.00%
.	Italy	number	249	375	21,489	2,955	0	0	N/A
.	Japan	number	6,482	14,874	17,923	8,696	7,244	2,914	-59.80%
.	Korea	number	3,375	8,548	13,526	21,966	3,981	3,453	-13.30%
.	Malaysia	number	42,769	35,910	4,980	3,423	1,248	475	-61.90%
.	Malta	number	0	0	0	18	0	0	N/A
.	Mexico	number	12,408	14,279	19,762	11,097	3,644	2,204	-39.50%
.	Netherlands	number	689	316	1	550	0	0	N/A
.	New Zealand	number	0	0	0	32	0	0	N/A
.	Norway	number	13	74	87	32	0	0	N/A
.	Philippines	number	4,748	6,645	3,665	9,110	634	1,737	174.00%
.	Portugal	number	109	100	0	0	0	0	N/A
.	Romania	number	0	0	2,520	0	0	0	N/A
.	Singapore	number	4,129	5,946	14,842	668	128	265	107.00%
.	Slovak Republic	number	203	5	4,842	1,879	1,264	0	-100.00%
.	Spain	number	1	0	2	0	0	0	N/A
.	Sweden	number	0	0	0	5	0	0	N/A
.	Switzerland	number	18	37	1	1	0	0	N/A
.	Taiwan	number	189,990	187,435	179,983	277,812	56,823	44,459	-21.80%
.	Thailand	number	91,285	17,196	7,784	4,693	1,152	11	-99.00%
.	Tunisia	number	0	0	675	1,125	0	0	N/A
.	Turkey	number	77	0	0	0	0	0	N/A
.	United Arab Em	number	0	0	0	4	0	0	N/A
.	United Kingdom	number	8,823	19,216	34,000	7,215	25	179	616.00%
.	Vietnam	number	3,500	0	30,166	115,848	21,248	29,589	39.30%
8504406012	Australia	number	288	64	0	1,560	420	19	-95.50%
.	Austria	number	82	12	6	10	10	0	-100.00%
.	Belgium	number	40	12	128	128	24	0	-100.00%
.	Br Virgin Is	number	3,874	0	0	0	0	0	N/A
.	Br Indian O Ter	number	2,470	9,409	6,550	0	0	0	N/A
.	Brazil	number	0	0	6	6	0	41	N/A
.	Cameroon	number	0	0	0	104	0	0	N/A
.	Canada	number	6,759	1,471	1,010	1,271	471	20	-95.80%
.	China	number	6,503,724	6,435,807	5,617,496	4,153,286	1,131,651	1,177,125	4.00%
.	Colombia	number	0	400	0	0	0	0	N/A
.	Czech Republic	number	302	54	1,092	43	20	40	100.00%

.	Denmark	number	5	3	0	3	0	0	N/A
.	Dominican Rep	number	0	0	2	0	0	0	N/A
.	Estonia	number	0	0	30	0	0	0	N/A
.	Finland	number	133	1	3	9	9	0	-100.00%
.	France	number	75	126	133	173	30	40	33.30%
.	Germany	number	328	2,293	578	603	252	98	-61.10%
.	Hong Kong	number	26,930	70,481	25,429	21,984	10,331	9,874	-4.40%
.	Hungary	number	379	5	1	0	0	0	N/A
.	India	number	2,619	1,959	1,398	198	0	384	N/A
.	Indonesia	number	463	347	1,403	3,002	1,168	60	-94.90%
.	Ireland	number	433	1,119	105	67	10	0	-100.00%
.	Israel	number	69,756	1,453	3,049	4,302	1,610	648	-59.80%
.	Italy	number	703	602	31	549	7	266	3700.00%
.	Japan	number	188	255	323	235	21	128	509.50%
.	Korea	number	3,194	2,000	206	1,187	1,061	15	-98.60%
.	Latvia	number	1,500	800	680	1,000	0	0	N/A
.	Malaysia	number	5,009	6,392	3,309	2,875	2,537	19,410	665.10%
.	Malta	number	0	0	0	8	0	0	N/A
.	Mexico	number	58,459	143,728	84,531	70,019	29,787	9,613	-67.70%
.	Netherlands	number	2,942	765	0	76	76	0	-100.00%
.	New Zealand	number	0	1	0	0	0	0	N/A
.	Norway	number	0	1	4	3	0	0	N/A
.	Philippines	number	26,978	12,288	40,620	47,751	10,707	10,782	0.70%
.	Poland	number	961	1	0	0	0	0	N/A
.	Portugal	number	0	86	0	2	0	0	N/A
.	Romania	number	104	12	4	38	0	0	N/A
.	Russia	number	15	0	0	0	0	0	N/A
.	Rwanda	number	0	0	0	200	200	0	-100.00%
.	Saudi Arabia	number	0	0	0	7,248	0	0	N/A
.	Singapore	number	909	1,265	817	1,166	82	0	-100.00%
.	Slovak Republic	number	285	274	635	885	142	0	-100.00%
.	Spain	number	2	18	8	9	9	0	-100.00%
.	Sweden	number	0	7	42	14	4	0	-100.00%
.	Switzerland	number	2,196	3,321	185	6	6	0	-100.00%
.	Taiwan	number	307,211	375,474	328,223	419,599	142,488	42,227	-70.40%
.	Thailand	number	300,567	271,499	202,771	234,365	45,715	68,250	49.30%
.	Tunisia	number	10	0	148	200	0	0	N/A
.	United Kingdom	number	863	283	358	857	84	1,410	1578.60%
.	Vietnam	number	1,900	0	0	6,563	1,551	13,720	784.60%

8504406018 POWER SUPPLIES SUITABLE FOR PHYSICAL INCORPORATION INTO AUTOMATIC DATA PROCESSING MACHINES OR UNITS THEREOF, WITH A POWER OUTPUT EXCEEDING 500W	Andorra	number	0	0	97	272	272	0	-100.00%
.	Antigua Barbuda	number	0	0	0	0	0	8	N/A
.	Argentina	number	28	0	0	0	0	0	N/A
.	Australia	number	46	36	20	30	0	8	N/A
.	Austria	number	315	256	463	930	176	14	-92.00%
.	Bahrain	number	0	0	0	7,000	0	0	N/A
.	Belgium	number	146	204	170	548	31	1,032	3229.00%
.	Br Indian O Ter	number	3,500	12,550	5,700	2,124	0	0	N/A
.	Brazil	number	112	100	4	60	0	0	N/A
.	Cameroon	number	98	0	1,016	0	0	0	N/A
.	Canada	number	5,089	3,712	1,992	1,537	463	289	-37.60%
.	Chile	number	0	1	3	0	0	0	N/A
.	China	number	8,435,214	6,899,447	6,317,730	6,630,024	1,587,811	1,330,256	-16.20%
.	Christmas Is	number	0	2,390	0	0	0	0	N/A
.	Colombia	number	0	9	0	0	0	0	N/A
.	Costa Rica	number	0	1	11,959	3,150	3,150	0	-100.00%
.	Cote d'Ivoire	number	0	0	72	0	0	0	N/A
.	Curacao	number	0	15	0	0	0	0	N/A
.	Czech Republic	number	570	27	485	1,430	454	220	-51.50%
.	Denmark	number	230	141	15	8	0	0	N/A
.	Dominican Rep	number	0	0	0	1	0	0	N/A
.	Estonia	number	0	0	1,134	1	1	0	-100.00%
.	Finland	number	277	144	135	23	2	51	2450.00%
.	France	number	86	81	509	260	123	13	-89.40%
.	Germany	number	9,005	2,930	31,602	23,714	684	1,547	126.20%
.	Greece	number	0	0	5	0	0	0	N/A
.	Guadeloupe	number	0	0	500	0	0	0	N/A
.	Honduras	number	404	0	0	0	0	0	N/A
.	Hong Kong	number	31,395	53,158	152,440	53,383	18,316	1,942	-89.40%
.	Hungary	number	17	110	11	16	0	8	N/A
.	Iceland	number	0	0	0	234	0	0	N/A
.	India	number	7,073	11,414	23,911	30,795	16,145	6,696	-58.50%
.	Indonesia	number	474	7	5,066	421	8	0	-100.00%
.	Ireland	number	1,871	2,409	1,812	529	128	257	100.80%
.	Israel	number	3,601	918	2,282	2,012	639	302	-52.70%
.	Italy	number	5,210	5,596	3,880	2,702	587	496	-15.50%
.	Japan	number	107,891	84,256	99,813	528,056	338,275	8,411	-97.50%
.	Korea	number	17,774	20,406	10,635	9,001	1,751	3,098	76.90%
.	Latvia	number	0	0	0	1,840	0	0	N/A

.	Liechtenstein	number	1	0	0	0	0	0	N/A
.	Lithuania	number	40	0	0	2	0	0	N/A
.	Madagascar	number	0	0	1	0	0	0	N/A
.	Malaysia	number	39,017	56,069	81,203	12,414	4,632	358	-92.30%
.	Malta	number	0	0	9	11	0	0	N/A
.	Mexico	number	31,459	49,107	87,402	105,422	32,182	18,512	-42.50%
.	Montenegro	number	0	2,572	0	0	0	0	N/A
.	Morocco	number	1	0	1	0	0	0	N/A
.	Netherlands	number	592	566	2,232	17,898	2,414	4,481	85.60%
.	New Zealand	number	1	7	10	0	0	0	N/A
.	Norway	number	2,688	1,203	72	14	0	2	N/A
.	Papua New Guin	number	0	0	8	0	0	0	N/A
.	Philippines	number	208,319	318,912	268,577	290,897	61,104	72,454	18.60%
.	Poland	number	55	27	23,853	13	12	3	-75.00%
.	Qatar	number	0	370	0	0	0	0	N/A
.	Romania	number	49	2	1,652	793	1	272	27100.00%
.	Russia	number	6	0	22	12	9	0	-100.00%
.	Sierra Leone	number	0	0	0	34	0	0	N/A
.	Singapore	number	2,696	6,193	1,499	9,977	308	24,735	7930.80%
.	Slovak Republic	number	23,804	11,260	20,299	15,177	5,164	3,165	-38.70%
.	Slovenia	number	0	0	16	54	51	0	-100.00%
.	South Africa	number	0	19	493	0	0	0	N/A
.	Spain	number	330	22	124	70	0	201	N/A
.	Sri Lanka	number	0	0	0	22	0	0	N/A
.	St Helena	number	0	0	16	0	0	0	N/A
.	Sweden	number	839	25	334	162	102	142	39.20%
.	Switzerland	number	4,653	17,560	2,813	399	90	27	-70.00%
.	Taiwan	number	510,906	611,509	1,614,951	666,874	143,829	174,508	21.30%
.	Thailand	number	282,560	228,549	312,614	123,935	33,164	29,689	-10.50%
.	Tunisia	number	1,146	62	1,421	1,157	8	6	-25.00%
.	Turkey	number	0	49	81	0	0	0	N/A
.	Ukraine	number	0	0	13	0	0	12	N/A
.	United Arab Em	number	262	54	0	336	0	0	N/A
.	United Kingdom	number	29,254	622	13,331	4,833	1,438	60	-95.80%
.	Vietnam	number	78,571	26,264	60,716	73,749	11,461	7,356	-35.80%
8504407001	Aruba	number	0	1	0	0	0	0	N/A
POWER SUPPLIES FOR AUTOMATIC DATA PROCESSING MACHINES, WITH A POWER OUTPUT NOT EXCEEDING 50W, NESOI									
.	Australia	number	65	1,000	12	24	12	15	25.00%
.	Austria	number	456	3,849	1,206	1,636	678	132	-80.50%
.	Belarus	number	0	0	0	12	0	0	N/A
.	Belgium	number	1,993	865	1,490	2,369	115	5	-95.70%
.	Brazil	number	0	0	0	146	0	0	N/A

.	Cambodia	number	0	780	0	0	0	0	N/A
.	Canada	number	2,162	6,958	4,490	1,068	120	53	-55.80%
.	China	number	15,993,535	17,132,541	13,441,666	16,068,371	4,701,190	3,392,558	-27.80%
.	Czech Republic	number	10,083	4,403	521	222	12	82	583.30%
.	Denmark	number	27	2	50	8	0	60	N/A
.	Dominican Rep	number	0	2	0	0	0	0	N/A
.	Estonia	number	26	0	0	0	0	0	N/A
.	Finland	number	13	0	299	19	0	0	N/A
.	France	number	463	2,993	2,297	12,078	10,052	309	-96.90%
.	Germany	number	81,425	71,719	78,882	79,450	21,184	6,931	-67.30%
.	Ghana	number	0	0	1	0	0	0	N/A
.	Hong Kong	number	117,295	14,506	68,025	162,754	2,320	54,757	2260.20%
.	Hungary	number	5	0	3	0	0	0	N/A
.	India	number	2,099	1,569	25	590	0	0	N/A
.	Indonesia	number	187	500	906	235	150	75	-50.00%
.	Ireland	number	2,779	2,274	3,195	3,504	965	935	-3.10%
.	Israel	number	645	16	0	1,203	0	9	N/A
.	Italy	number	1,363	3,371	1,234	1,705	1	10	900.00%
.	Japan	number	1,860	564	568	822	119	198	66.40%
.	Korea	number	10,070	8,806	19,864	38,928	2,463	8,000	224.80%
.	Kuwait	number	0	2	0	0	0	0	N/A
.	Latvia	number	0	0	6,519	0	0	0	N/A
.	Luxembourg	number	0	1	0	0	0	0	N/A
.	Macao	number	0	0	0	0	0	500	N/A
.	Malaysia	number	4,950	18,207	16,956	16,339	8,536	1,708	-80.00%
.	Mexico	number	212,983	146,133	54,999	46,789	10,709	26,924	151.40%
.	Monaco	number	4	0	0	0	0	0	N/A
.	Netherlands	number	937	4,470	781	33	0	601	N/A
.	Nigeria	number	0	0	10	0	0	0	N/A
.	Norway	number	4	10	5	0	0	0	N/A
.	Panama	number	0	1	0	0	0	0	N/A
.	Philippines	number	442	803	14,497	15,671	0	3,172	N/A
.	Poland	number	4,394	1	0	3,472	0	15,619	N/A
.	Romania	number	3,245	726	2,359	783	0	0	N/A
.	Russia	number	0	0	4	0	0	0	N/A
.	Singapore	number	799	120	653	0	0	0	N/A
.	Slovak Republic	number	5,665	671	1,892	20	0	260	N/A
.	Slovenia	number	5	0	0	0	0	0	N/A
.	South Africa	number	33	0	0	0	0	0	N/A
.	Spain	number	16	43	25	0	0	0	N/A
.	Sweden	number	300	0	0	475	325	4	-98.80%
.	Switzerland	number	738	2,356	1	948	402	1,199	198.30%
.	Taiwan	number	263,548	165,769	220,989	185,136	42,637	48,719	14.30%
.	Thailand	number	49,441	52,878	14,887	32,822	731	3,819	422.40%
.	Tunisia	number	0	0	372	70	0	0	N/A

.	Turkey	number	0	30	0	0	0	0	N/A
.	Ukraine	number	0	100	0	0	0	0	N/A
.	United Arab Em	number	1	0	0	1	0	0	N/A
.	United Kingdom	number	2,556	1,605	822	1,357	485	442	-8.90%
.	Vietnam	number	241	194	16,180	850	0	0	N/A
8504407007 POWER SUPPLIES FOR AUTOMATIC DATA PROCESSING MACHINES, WITH A POWER OUTPUT EXCEEDING 50W BUT NOT EXCEEDING 150W, NESOI	Australia	number	22	500	120	103	24	56	133.30%
.	Austria	number	66	66	92	63	23	2	-91.30%
.	Bahrain	number	0	2	0	0	0	0	N/A
.	Belgium	number	295	6	0	191	40	0	-100.00%
.	Bulgaria	number	0	0	0	28	0	0	N/A
.	Canada	number	1,173	1,027	5,459	4,807	459	1,756	282.60%
.	Chile	number	0	0	142	0	0	0	N/A
.	China	number	8,752,592	12,422,235	8,893,880	8,364,991	1,950,268	1,801,924	-7.60%
.	Colombia	number	0	3,000	0	18	18	6,580	36455.60%
.	Costa Rica	number	262	0	0	0	0	0	N/A
.	Czech Republic	number	20,357	20,594	11,013	10,969	3,313	2,174	-34.40%
.	Denmark	number	26	0	0	0	0	1	N/A
.	Finland	number	25	0	13	14	0	0	N/A
.	France	number	12,156	25,652	13,097	22,041	3,154	2,478	-21.40%
.	Germany	number	18,040	24,731	36,722	58,273	8,601	1,821	-78.80%
.	Hong Kong	number	36,615	5,436	3,038	11,335	0	4,900	N/A
.	Hungary	number	149	0	380	0	0	0	N/A
.	India	number	1,358	1,335	162	181	3	0	-100.00%
.	Indonesia	number	5,745	1,939	903	160	100	60	-40.00%
.	Ireland	number	5,585	5,789	5,987	4,603	1,692	501	-70.40%
.	Israel	number	436	369	212	150	0	0	N/A
.	Italy	number	25,570	34,954	13,709	13,583	178	40	-77.50%
.	Japan	number	4,487	4,859	1,978	1,002	559	15,617	2693.70%
.	Korea	number	24,547	15,811	18,830	16,550	50	2,502	4904.00%
.	Latvia	number	0	0	0	60	0	2	N/A
.	Malaysia	number	9,149	11,301	16,515	27,716	8,295	2,756	-66.80%
.	Mexico	number	444	1,464	482	6,709	4,425	66	-98.50%
.	Netherlands	number	118	21	3,640	10,203	4,079	3,120	-23.50%
.	New Zealand	number	3	0	0	20	0	1,500	N/A
.	Norway	number	0	0	4	9	0	0	N/A
.	Philippines	number	335	105,112	31,443	3,798	1,009	1,065	5.60%
.	Poland	number	974	801	0	3,405	0	16,295	N/A
.	Romania	number	0	0	1,650	0	0	0	N/A
.	Singapore	number	367	9,484	1,517	2,688	0	300	N/A
.	Slovak Republic	number	20	58	313	774	432	162	-62.50%
.	Slovenia	number	7	0	1	0	0	0	N/A

.	South Africa	number	0	7	0	0	0	0	N/A
.	Spain	number	12	0	158	77	0	24	N/A
.	Sweden	number	331	337	483	729	184	135	-26.60%
.	Switzerland	number	772	264	373	142	0	1	N/A
.	Taiwan	number	149,806	264,963	240,826	316,863	81,905	131,815	60.90%
.	Thailand	number	108,712	65,217	51,465	86,474	13,956	27,164	94.60%
.	Tunisia	number	25,712	27,462	9,590	0	0	0	N/A
.	Turkey	number	0	50	0	1	0	0	N/A
.	United Kingdom	number	3,408	4,084	2,911	2,443	534	273	-48.90%
.	Vietnam	number	0	0	100	798	158	120	-24.10%
8504407012 POWER SUPPLIES FOR AUTOMATIC DATA PROCESSING MACHINES, WITH A POWER OUTPUT EXCEEDING 150W BUT NOT EXCEEDING 500W, NESOI	Australia	number	0	20	3	32	6	16	166.70%
.	Austria	number	72	2,433	77	20	4	4	0.00%
.	Belgium	number	30	0	0	0	0	0	N/A
.	Brazil	number	3	40	0	1	0	0	N/A
.	Canada	number	1,634	4,070	1,458	391	124	187	50.80%
.	Chile	number	0	0	112	0	0	2	N/A
.	China	number	2,055,982	2,398,082	2,670,595	2,934,308	660,785	532,310	-19.40%
.	Christmas Is	number	169	0	0	0	0	0	N/A
.	Colombia	number	0	570	0	0	0	0	N/A
.	Czech Republic	number	16,840	15,414	12,280	16,284	3,452	3,966	14.90%
.	Denmark	number	102	6	401	210	0	18	N/A
.	Dominican Rep	number	0	9	0	0	0	0	N/A
.	Estonia	number	0	0	0	7	0	153	N/A
.	Finland	number	181	83	21	104	1	0	-100.00%
.	France	number	67	94	77	61	10	13	30.00%
.	Germany	number	4,051	2,970	6,387	6,080	1,357	721	-46.90%
.	Hong Kong	number	19,399	32,532	2,926	52,807	21,073	4,312	-79.50%
.	India	number	211	2,285	1,341	2,645	10	1,017	10070.00%
.	Indonesia	number	490	0	257	0	0	0	N/A
.	Ireland	number	772	323	152	288	0	0	N/A
.	Israel	number	24	13	26	14	9	26	188.90%
.	Italy	number	3,696	2,403	1,423	1,223	0	251	N/A
.	Japan	number	1,428	775	14,931	834	385	102	-73.50%
.	Korea	number	3,030	1,774	343	521	306	2,991	877.50%
.	Macao	number	3,236	0	0	0	0	0	N/A
.	Malaysia	number	2,060	3,204	2,320	1,146	158	153	-3.20%
.	Mexico	number	4,771	7,093	2,814	2,705	526	7,835	1389.50%
.	Netherlands	number	94	38	236	620	6	12	100.00%
.	New Zealand	number	0	460	0	1	0	0	N/A
.	Norway	number	24	16	4	0	0	0	N/A
.	Philippines	number	1,784,526	1,907,319	1,989,556	1,808,562	369,387	235,347	-36.30%

.	Poland	number	342	190	2	2	0	2	N/A
.	Singapore	number	6,387	2,047	991	908	314	0	-100.00%
.	Slovak Republic	number	309	196	255	238	30	170	466.70%
.	Spain	number	1	0	0	1,502	0	0	N/A
.	Sweden	number	0	1,259	1	2,001	0	0	N/A
.	Switzerland	number	0	25	14	5	2	0	-100.00%
.	Taiwan	number	119,059	261,900	231,815	130,010	36,020	22,902	-36.40%
.	Thailand	number	72,919	77,382	80,158	62,015	14,941	15,254	2.10%
.	Tunisia	number	0	114	150	50	0	0	N/A
.	United Kingdom	number	250	2,045	3,530	3,310	1,718	330	-80.80%
.	Vietnam	number	164	20	64	184	144	0	-100.00%
8504407018 POWER SUPPLIES FOR AUTOMATIC DATA PROCESSING MACHINES OR UNITS THEREOF, WITH A POWER OUTPUT EXCEEDING 500W, NESOI	Argentina	number	0	0	40	72	0	50	N/A
.	Australia	number	1,129	73	229	137	57	30	-47.40%
.	Austria	number	1,520	270	120	877	1	40	3900.00%
.	Bahrain	number	0	1	1	1	0	0	N/A
.	Belgium	number	59	1,701	2,931	28	3	22	633.30%
.	Benin	number	80	0	0	0	0	0	N/A
.	Bermuda	number	0	0	0	2	2	0	-100.00%
.	Bosnia-Herzegovina	number	0	36	0	0	0	0	N/A
.	Br Indian O Ter	number	0	0	3,205	0	0	0	N/A
.	Brazil	number	303	4	3	209	67	0	-100.00%
.	Bulgaria	number	372	0	3	6	1	1	0.00%
.	Canada	number	9,234	12,934	6,881	76,966	1,301	6,837	425.50%
.	Chile	number	3	0	0	0	0	0	N/A
.	China	number	5,038,373	5,642,044	5,171,079	4,854,921	973,199	1,016,061	4.40%
.	Colombia	number	0	1	5	0	0	0	N/A
.	Costa Rica	number	0	4	0	0	0	0	N/A
.	Croatia	number	20	50	149	246	0	0	N/A
.	Czech Republic	number	25,630	21,789	26,454	34,186	15,210	10,754	-29.30%
.	Denmark	number	284	300	269	327	93	76	-18.30%
.	Dominican Rep	number	1,052	438	0	4	1	0	-100.00%
.	Estonia	number	0	2,259	25,981	21,212	4,750	7,526	58.40%
.	Finland	number	211	173	67	5,494	104	19	-81.70%
.	France	number	1,340	1,060	4,790	2,998	224	549	145.10%
.	Germany	number	155,745	931,531	154,427	25,463	3,394	5,124	51.00%
.	Greece	number	0	10	0	0	0	0	N/A
.	Honduras	number	0	0	0	59	0	0	N/A
.	Hong Kong	number	90,197	24,493	55,949	181,409	20,182	2,544	-87.40%
.	Hungary	number	74	30	764	211	2	250	12400.00%
.	India	number	93,515	120,908	45,775	9,576	6,327	700	-88.90%
.	Indonesia	number	3,820	298	522	0	0	0	N/A

.	Ireland	number	10,631	4,956	5,839	5,271	1,362	1,057	-22.40%
.	Israel	number	7,756	1,087	5,031	342	48	1	-97.90%
.	Italy	number	3,274	5,262	4,266	7,634	4,179	2,485	-40.50%
.	Japan	number	100,894	125,620	88,154	61,296	10,031	3,824	-61.90%
.	Korea	number	10,219	4,641	22,405	43,214	597	36,803	6064.70%
.	Latvia	number	0	0	0	100	0	0	N/A
.	Lithuania	number	0	0	0	1	1	0	-100.00%
.	Malaysia	number	30,327	15,930	17,074	15,555	5,295	3,137	-40.80%
.	Malta	number	0	0	10	12	0	0	N/A
.	Mexico	number	84,103	70,767	206,960	303,152	81,249	73,333	-9.70%
.	Monaco	number	0	8	0	0	0	0	N/A
.	Morocco	number	0	0	1	0	0	0	N/A
.	Nepal	number	0	0	1	0	0	0	N/A
.	Netherlands	number	719	338	380	4,247	1,664	65	-96.10%
.	New Zealand	number	2,851	3,150	5,534	2,053	556	214	-61.50%
.	Norway	number	33,340	9,990	971	3,335	16	703	4293.80%
.	Oman	number	0	0	0	1	0	0	N/A
.	Panama	number	0	1	0	0	0	0	N/A
.	Philippines	number	1,041,074	1,054,642	1,101,893	1,330,279	191,099	300,751	57.40%
.	Poland	number	9,683	2,022	3,067	55	0	3	N/A
.	Portugal	number	0	0	0	6	0	0	N/A
.	Romania	number	1,227	187,992	121,658	197	0	118	N/A
.	Saudi Arabia	number	0	0	0	1	0	0	N/A
.	Sierra Leone	number	0	0	0	1	0	0	N/A
.	Singapore	number	18,320	3,971	29,379	4,217	25	3,813	15152.00%
.	Slovak Republic	number	1,800	1,698	2,824	2,296	87	190	118.40%
.	Slovenia	number	799	2,033	2,211	116	116	0	-100.00%
.	South Africa	number	0	15	0	73	0	232	N/A
.	Spain	number	349	104,557	267,422	133,264	71,201	1,234	-98.30%
.	Sri Lanka	number	0	2,000	0	0	0	0	N/A
.	Sweden	number	502	811	691	357	173	238	37.60%
.	Switzerland	number	994	488	480	231	28	19	-32.10%
.	Taiwan	number	449,178	391,087	508,407	389,276	117,017	120,257	2.80%
.	Thailand	number	97,934	46,542	46,637	28,781	6,061	5,585	-7.90%
.	Tunisia	number	60	4	3,585	301	0	23	N/A
.	Turkey	number	20	0	124	8	0	0	N/A
.	United Arab Em	number	3	0	0	0	0	0	N/A
.	United Kingdom	number	5,263	3,713	10,961	7,718	5,174	1,786	-65.50%
.	Uruguay	number	0	0	15	6	0	0	N/A
.	Vietnam	number	1,184	13,261	4,100	22,982	10,189	0	-100.00%

Total

61,880,112

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

Company Name	Category Name	ENERGY STAR		Color Keys			
		Yes	No				
ABB Power Protection SA	Uninterruptible Power Supplies YEDU		1	Color coding as followed: Light Blue cells: UL Listed Products Web Link: http://database.ul.com/cgi-bin/XYV/template/LISEXT/1FRAME/index.html?_ga=1.255282504.1506074008.1493217024 Enter YEDU in the UL Category Code Box Light Yellow cells: ETL Listed Products Web Link: http://etlwhidirectory.etlsemko.com//WebClients/ITS/DLP/products.nsf/vwSearch?SearchView&Query=FIELD%20CatCode%20contains%20UL-1778&SearchOrder=3&SearchMax=1000&SearchWV=FALSE&SearchThesaurus=FALSE&SearchFuzzy=FALSE Light Red cells: CSA Listed Products Web Link: http://www.csagroup.org/services/testing-and-certification/product-listing/ White Cells: Unknown lister			
Ablerex Electronics Co LTD	Uninterruptible Power Supplies YEDU		1				
Accratech Inc.	Uninterruptible Power Supplies YEDU		1				
Active Power Inc.	Uninterruptible Power Supplies YEDU		1				
ADI	Uninterruptible Power Supplies YEDU		1				
Adpos Advanced Power Systems	Uninterruptible Power Supplies YEDU		1				
Allis Electronics CO LTD	Uninterruptible Power Supplies YEDU		1				
Alpha Technologies LTD	Uninterruptible Power Supplies YEDU		1				
Alpha Industrial Power	Uninterruptible Power Supplies 5311-08		1				
Always on UPS Systems	Uninterruptible Power Supplies YEDU		1				
Ametek Solidstate Controls	Uninterruptible Power Supplies YEDU		1				
Anton Piller	Uninterruptible Power Supplies 1778		1				
Atlantic Battery Systems Inc.	Uninterruptible Power Supplies YEDU		1				
Borri Spa	Uninterruptible Power Supplies 5311-88		1				
Bourne Inc.	Uninterruptible Power Supplies 1778		1				
Belkin International Inc.	Uninterruptible Power Supplies YEDU		1				
C & D Technologies Inc.	Uninterruptible Power Supplies YEDU		1				
C & C Power Inc.	Uninterruptible Power Supplies YEDU		1				
CE + T America Inc.	Uninterruptible Power Supplies YEDU		1				
Chicago Digital Power	Uninterruptible Power Supplies YEDU		1				
Chloride, A Genlyte Company	Uninterruptible Power Supplies YEDU		1				
Cholride Power Electronics (UK)	Uninterruptible Power Supplies 1778		1				
Clary Corp Precision Industry Div.	Uninterruptible Power Supplies YEDU		1				
Controlled Power Co.	Uninterruptible Power Supplies YEDU		1				
Core Brands LLC	Uninterruptible Power Supplies YEDU		1				
Coredel (France)	Uninterruptible Power Supplies 1778		1				
Cyber Power Systems Inc.	Uninterruptible Power Supplies YEDU	1					
Delta Electronincs	Uninterruptible Power Supplies YEDU		1				
Diversified Assembly technologies Corp.	Uninterruptible Power Supplies YEDU		1				
Diversified Technologies Group Inc. DBA Ditek	Uninterruptible Power Supplies YEDU		1				
Doorking Inc	Uninterruptible Power Supplies 1778		1				
DSPM	Uninterruptible Power Supplies 1778		1				
Eaton	Uninterruptible Power Supplies YEDU	1					
Efore OYJ	Uninterruptible Power Supplies 1778		1				
Elka-Torantriebe	Uninterruptible Power Supplies 1778 REC		1				
Eltek	Uninterruptible Power Supplies	1					
EGS Electrical Group	Uninterruptible Power Supplies YEDU		1				
Electronic System Protection	Uninterruptible Power Supplies 1778		1				
Electronic System Support	Uninterruptible Power Supplies YEDU		1				
Emerson Network Power CO LTD	Uninterruptible Power Supplies YEDU	1					
Engetron Engenharia Electronica Industria	Uninterruptible Power Supplies YEDU		1				
Falcon Electronic Inc.	Uninterruptible Power Supplies YEDU		1				
Fellowes Inc.	Uninterruptible Power Supplies YEDU		1				
Flat Pack	Uninterruptible Power Supplies	1					

Forza Power Technologies LLC	Uninterruptible Power Supplies YEDU		1				
Franek Technologies Inc.	Uninterruptible Power Supplies YEDU		1				
Fuji Electric CO LTD	Uninterruptible Power Supplies YEDU	1					
Gamatronic Electronic Industries LTD.	Uninterruptible Power Supplies YEDU		1				
GE Consumer & Industrial SA	Uninterruptible Power Supplies YEDU		1				
GE Zenith Controls	Uninterruptible Power Supplies YEDU		1				
General Power Systems Inc.	Uninterruptible Power Supplies 1778		1				
Green Power Electronics CO. LTD.	Uninterruptible Power Supplies 1778		1				
GS YUASA International LTD.	Uninterruptible Power Supplies YEDU		1				
Guang Dong Zhicheng Champion Group	Uninterruptible Power Supplies YEDU		1				
Hitachi Information & Telecommunication Engineering LTD.	Uninterruptible Power Supplies YEDU		1				
Hitachi Hi-REL Power Electronics (India)	Uninterruptible Power Supplies 1778		1				
Huawei Technologies Co LTD.	Uninterruptible Power Supplies YEDU	1					
Hubble Lighting Inc.	Uninterruptible Power Supplies YEDU		1				
Hysecurty Gate Inc.	Uninterruptible Power Supplies 1778		1				
Idowell S.R.L. (Italy)	Uninterruptible Power Supplies 1778		1				
Industronic	Uninterruptible Power Supplies YEDU		1				
Ingram Micro	Uninterruptible Power Supplies	1					
Intellibatt LLC	Uninterruptible Power Supplies 1778		1				
Intrapack Industries Inc.	Uninterruptible Power Supplies YEDU		1				
J Schneider Elektrotechnik GMBH	Uninterruptible Power Supplies YEDU		1				
Keene-Widelite	Uninterruptible Power Supplies 1778		1				
Kisae Technology Co. LTD.	Uninterruptible Power Supplies 1778		1				
Kohler Co	Uninterruptible Power Supplies 1778		1				
Legacy Power Conversion	Uninterruptible Power Supplies YEDU		1				
Lianzheng Electronics CO LTD.	Uninterruptible Power Supplies YEDU		1				
Leibert Corp	Uninterruptible Power Supplies YEDU		1				
Liion LLC	Uninterruptible Power Supplies YEDU		1				
LTI Power Systems Inc.	Uninterruptible Power Supplies YEDU		1				
Majorpower Corp.	Uninterruptible Power Supplies 1778		1				
Marathon Power Inc.	Uninterruptible Power Supplies 1778		1				
Mesta Electronics Inc.	Uninterruptible Power Supplies YEDU		1				
Methode Active Energy Solutions	Uninterruptible Power Supplies YEDU		1				
Middle Atlantic Products Inc.	Uninterruptible Power Supplies YEDU		1				
Mitsubishi Electric	Uninterruptible Power Supplies YEDU		1				
Muniteman Power Tech	Uninterruptible Power Supplies	1					
Myers Power Products	Uninterruptible Power Supplies YEDU		1				
Multilink Inc.	Uninterruptible Power Supplies 1778		1				
Nature Power Technology LTD	Uninterruptible Power Supplies 1778		1				
New Focus Lighting and Power Technology Co. LTD.	Uninterruptible Power Supplies 1778		1				
Omron Corporation Electronics (Japan)	Uninterruptible Power Supplies YEDU		1				
On-Line Power Inc	Uninterruptible Power Supplies YEDU		1				
Opti International Corp	Uninterruptible Power Supplies YEDU		1				
Orion Power Systems	Uninterruptible Power Supplies YEDU		1				
Outback Power Technologies Inc.	Uninterruptible Power Supplies 1778		1				
Pacific Power Control Inc.	Uninterruptible Power Supplies 1778		1				

Para Systems Inc	Uninterruptible Power Supplies YEDU		1					
Perfect Engineers (India)	Uninterruptible Power Supplies 1778		1					
Philtex Electronics Limited	Uninterruptible Power Supplies 5311-88		1					
Phoenixtec Power Co LTD.	Uninterruptible Power Supplies YEDU		1					
Pillar Group	Uninterruptible Power Supplies 1778 REC	1						
Power Bright LTD.	Uninterruptible Power Supplies 1778		1					
Powercom CO LTD.	Uninterruptible Power Supplies YEDU		1					
Power Innovations International CO. LTD.	Uninterruptible Power Supplies 1778		1					
Powersolve Electronics LTD.	Uninterruptible Power Supplies YEDU		1					
Powervar Inc. DBA Ametek Powervar	Uninterruptible Power Supplies YEDU		1					
Purcell Systems Inc.	Uninterruptible Power Supplies 5311-88		1					
Rittal Corp	Uninterruptible Power Supplies YEDU		1					
Rockwell Automation/Allen-Bradley	Uninterruptible Power Supplies YEDU		1					
Romac Supply Co Inc.	Uninterruptible Power Supplies 1778		1					
RPS S P A	Uninterruptible Power Supplies YEDU		1					
S & C Electronic Co Power Quality Product Div.	Uninterruptible Power Supplies YEDU		1					
Sanken Electronics CO LTD.	Uninterruptible Power Supplies YEDU		1					
Sanyo Denki CO LTD.	Uninterruptible Power Supplies YEDU		1					
Schneider Electric IT Corporation, FKA APC American Power Conversion	Uninterruptible Power Supplies YEDU	1						
Schneider Electric Solar	Uninterruptible Power Supplies 1778 CLS		1					
Shenzhen Kstar Science & Technology CO LTD.	Uninterruptible Power Supplies YEDU		1					
Smart Power Systems	Uninterruptible Power Supplies YEDU		1					
Sotec Technology Co. LTD.	Uninterruptible Power Supplies 1778		1					
Staco Energy Products CO.	Uninterruptible Power Supplies YEDU		1					
Sunverge Energy Inc	Uninterruptible Power Supplies 1778		1					
Sumec Hardware and Tolls Co	Uninterruptible Power Supplies 1778		1					
Superior Electronic Holding Group LLC	Uninterruptible Power Supplies YEDU		1					
Synchrony Inc,	Uninterruptible Power Supplies 1778 REC		1					
Sysgration LTD.	Uninterruptible Power Supplies YEDU		1					
Technology Dynamics Inc.	Uninterruptible Power Supplies 1778		1					
Termaco LTEE	Uninterruptible Power Supplies YEDU		1					
Thomas & Betts Power Solutions	Uninterruptible Power Supplies YEDU		1					
Thor Systems Inc.	Uninterruptible Power Supplies YEDU		1					
Toshiba International Corp	Uninterruptible Power Supplies YEDU		1					
Tripp Manufacturing Company	Uninterruptible Power Supplies 1778	1						
TSI Power Corp	Uninterruptible Power Supplies 1778		1					
Tycor UPS Systems Inc.	Uninterruptible Power Supplies YEDU		1					
Universal Power Group	Uninterruptible Power Supplies 1778		1					
UP Systems Inc.	Uninterruptible Power Supplies 1778		1					
UPSYSTEM Inc/ Chloride Power Protection	Uninterruptible Power Supplies 1778		1					
VAISALA Inc	Uninterruptible Power Supplies 1778		1					
Voltronics Power Technology Corp	Uninterruptible Power Supplies YEDU		1					
V7	Uninterruptible Power Supplies	1						
W Box	Uninterruptible Power Supplies	1						
Wirepath Home Systems, DBS SNAP	Uninterruptible Power Supplies YEDU		1					
Xantrex Technolgies Inc.	Uninterruptible Power Supplies 1778		1					

Xiamen Kehua Hengsheng Co LTD	Uninterruptible Power Supplies YEDU		1				
XPC Corp	Uninterruptible Power Supplies YEDU		1				
Z Power and Distrubution Inc.	Uninterruptible Power Supplies YEDU		1				
		14	125	11.20%			

One may infer that by company 11.20% of UPS manufactures that sell product into the US market chose to participate in the ENERGY STAR Program. Overlapping company listings are combined into 1 line for ease. For example Emerson E*, Emerson Industrial and Liebert are noted as Emerson. Schneider E* is combined from APC, Schneider and Schneider APC in to 1 entry as well. Likewise, Minuteman and Mitsubishi have multiple E* entries.