

# SNIA Comments on ENERGY STAR® Data Center Storage V2.0 Final Draft

This document presents the comments of the SNIA Green Storage Technical Working Group and SNIA Green Storage Initiative on the ENERGY STAR Data Center Storage V2.0 Final Draft.

*Response dated 05/06/2020*

## About SNIA

The Storage Networking Industry Association is a not-for-profit global organization, made up of member companies spanning the global storage market. SNIA's mission is to lead the storage industry worldwide in developing and promoting standards, technologies, and educational services to empower organizations in the management of information. To this end, the SNIA is uniquely committed to delivering standards, education, and services that will propel open storage networking solutions into the broader market. For additional information, visit the SNIA web site at [www.snia.org](http://www.snia.org).

The SNIA comments represent the technical work and viewpoints of the Green Storage Initiative (GSI) <http://www.snia.org/forums/green> and the Green Storage Technical Working Group (TWG) [http://www.snia.org/tech\\_activities/work/twgs/](http://www.snia.org/tech_activities/work/twgs/). Collectively, the TWG and GSI represent over 19 companies and several individual subject matter experts. Collectively, the SNIA is a well-established subject matter voice for the multi-billion dollar a year global storage and information management industry. SNIA is also the developer of the SNIA Emerald™ Specification and the SNIA Emerald™ Program, which are test and measurement method underpinnings for the EPA Energy Star Data Center Storage Specification.

Contacting SNIA for further discussion about this response can be arranged through SNIA Green Storage TWG and GSI leaders Herb Tanzer, Don Goddard, and/or Wayne Adams, with contact information on file with the ENERGY STAR Program Management Team. Alternatively, email can be sent to [emerald@snia.org](mailto:emerald@snia.org).

## Comments

The SNIA Green Storage Initiative and SNIA Green Storage Technical Working Group have reviewed and discussed ENERGY STAR Data Center Storage V2.0 Final Draft and the Draft Test Method, and offer the following comments, organized by line item number

## Eligibility Criteria – Final Draft V2.0

Line 364-365 “The same weighting of the sums should also be used for subsequent certification measurements”

SNIA believes that this does not meet the current Spec criteria for individual Read & Write limits/reporting. SNIA recommends that this line be removed.

Line 374-379 “The manufacturer must choose a single type of or combination of hard disk storage devices and solid state storage devices which result in the highest work/watt for that workload type. The amount of solid state storage devices in the tested configuration in a hybrid disk/solid state configuration cannot exceed 30% of the addressable storage being represented by solid state unless the product is testing with only solid state devices in which all devices in the configuration shall be solid state devices.”

SNIA believes this is redundant and can be potentially confusing. SNIA recommends replacing the above paragraph with:

The manufacturer must choose a single type or combination of types (in the case of a hybrid hard disk/solid state product) of hard disk storage devices and/or solid state storage devices which result in the highest work/watt for that workload type. The addressable storage of the solid state storage devices in the tested configuration of a hybrid hard disk/solid state product family cannot exceed 30%.

Line 482 “Note: EPA anticipates completing the Version 8.0 process no later than June 15, 2020 with an effective date of March 15, 2021.”

There is a typo here; Version 8.0 should be Version 2.0.

## Draft Test Method

SNIA has no comments on this document