



October 20, 2017

United States Environmental Protection Agency
Office of Air and Radiation
Washington, D.C. 20460

Regarding: Stakeholder Comments on ENERGY STAR® for UPS Draft 1 Version 2.0 Eligibility Criteria

Dear Mr. Fogle,

Schneider Electric appreciates the opportunity to comment on the ENERGY STAR for UPS V2.0 Draft 2, and we appreciate ENERGY STAR programs consideration of our comments on ENERGY STAR for UPS V2.0 Draft 1. We appreciate and agree with the ENERGY STAR program effort to revise the UPS criteria. We remain concerned that the proposed criteria are based upon possible DOE Rulemaking that has not occurred and that since the prepublication last year has been unpublished. Given the length of time expired we are concerned that the DOE Rulemaking may not be published.

We at Schneider Electric understand that revising the ENERGY STAR for UPS specification is necessary, as it has been almost 5 years since the publication of the Version 1.0 specification. We are concerned that the proposed levels for VI and VFD remain excessive in absence of the DOE rulemaking. And, the DOE rulemaking while prepublished is not published.

ENERGY STAR's UPS V2.0 implementation timeline places ENERGY STAR requirements on industry more than a year in advance of DOE rulemaking should DOE rulemaking be announced in the Federal Register by end of year 2017.

We are aware that establishing energy efficiency limits for the ENERGY STAR **for** UPS 2.0 program at more reasonable levels may potentially incur another revision to the program should the DOE Rulemaking promulgate. We also propose this course with the ENERGY STAR program and would support a short revision cycle development effort.

The uncertainty of the DOE Rulemaking status and the ENERGY STAR V 2.0 development effort creates burden on the UPS industry and its consumers. Schneider Electric requests ENERGY STAR to lower the proposed requirements to allow an additional 0.5% margin, thus allowing "on or near" products to be maintained in the product catalog. On the other hand, keeping current analytical assumptions the same, the EPA could adjust the VFD and VI product efficiency requirements to allow the top 20% of the market, as identified in the data shared during the webinar held on October 4, 2017.

Referenced Comments:

Lines 170 and 171, (Reference: Clause 3.1.1) Consistency between the DOE's mandatory regulations and the EPA's voluntary requirements is required by statute. Differences exist between the new DOE UPS test procedures and the

ENERGY STAR for UPS 2.0 procedure need resolution. We recommend the sentence in this clause read “All calculations shall be carried out with the actual measured values rounded to the third decimal place.”

Lines 174 thru 176, (Reference Clause 3.1.3) Consistency between the DOE’s mandatory regulations and the EPA’s voluntary standards. ENERGY STAR requirements must be aligned with DOE’s to prevent manufacturers from generating different levels of computations based upon the size (Wattage) of the UPS being tested. The sentence should read “For all UPS units the calculated efficiency values shall be rounded to one-tenth of a percentage point.”

Conclusion

We very much appreciate the cooperation demonstrated by the ENERGY STAR program in the UPS specification development process.

As a participant in the marketplace we value the ENERGY STAR program. Our contributions are focused upon what we consider items that bring value to this program, as well as a willingness to work with ENERGY STAR in establishing criteria, test specifications, and other requirements to distinguish products that excel in energy efficiency and earning the ENERGY STAR brand. We thank you for the opportunity to comment and we remain available for further discussions on the topic.

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