

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

June 11, 2017

Mr. Ryan Fogle
United States Environmental Protection Agency
ENERGY STAR Program
1200 Pennsylvania Ave NW
Washington, DC 20460

Dear Mr. Fogle,

This letter provides comments from the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficient Economy (ACEEE) on draft 3 of the ENERGY STAR for Computer Servers version 3.0 specification released May 3, 2018. We generally support comments submitted by the Natural Resources Defense Council on this draft of the specification, in particular as follows:

1. Efficiency requirements based on the Server Efficiency Rating Tool (SERT) “active” metric are adequate without separate idle state requirements.

In earlier comments, ASAP supported the inclusion of the SERT benchmark in version 3.0 of the ENERGY STAR for Computer Servers specification in addition to idle mode efficiency requirements because our understanding of SERT was that it focused exclusively on active mode energy consumption. Following review of materials presented during the March 21, 2018 webinar, our understanding of SERT has evolved and we now agree with industry and NRDC that the SERT metric is adequate without separate idle state efficiency requirements, as long as the SERT levels included in version 3.0 are sufficiently stringent.

2. EPA should enhance the effectiveness, and longevity, of version 3 by targeting an initial average pass-rate of 25 % at the effective date.

Technical analysis of average pass rates for servers is necessarily based on a review of existing products, in some cases this means server models that are three or more years old. Three years is a long time in the world of server technology evolution. When the ENERGY STAR for Computer Servers version 3.0 specification becomes effective, perhaps in mid-2019, the performance data will be even older.

EPA should anticipate a steep increase in the average pass rate for servers during the first year after version 3.0 comes into effect. If initial efficiency requirements are not set high enough, the market could be quickly dominated by ENERGY STAR qualified products and version 3.0 will only differentiate the most efficient products for a short time, requiring new revisions to the specification. ASAP and ACEEE believe that the ENERGY STAR for Computer Servers version 3.0 specification should be attainable, but aspirational, when it first comes into effect.

3. The ENERGY STAR for Computer Servers version 3.0 specification should include more stringent requirements for low-load efficiency.

We support EPA's proposal to strengthen power supply unit (PSU) efficiency requirements in light of the fact that 63% of configurations tested for version 2.0 of the ENERGY STAR for Computer Servers specification achieved Platinum level. We also support NRDC's comments submitted June 4, 2018 regarding efficiency requirements for 10% and 20% load levels.

Thank you for the opportunity to provide these comments on draft 3 of the ENERGY STAR for Computer Servers version 3.0 specification.

Sincerely,



Chris Granda
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Appliance Standards Awareness Project (ASAP)



Jennifer Thorne Amann
Buildings Program Director
American Council for an Energy-Efficient Economy