Summary

Climate Savers Computing Initiative (CSCI) would like to take the opportunity to offer comments on ENERGY STAR's proposed revisions in the Computer Draft V5.2 and the Server Draft V1.1 Specifications. Our input focuses primarily on power supply testing criteria. We hope these comments and recommendations will be useful during final revisions to both respective specifications. We welcome the opportunity to discuss this topic further as the ENERGY STAR® team finalizes the Computer and Server Revisions.

Power Supply Certification

When formalized, the proposed changes in the computer and server specifications would require that certified data from an accredited lab be submitted to a certification body for review in order for new systems to be considered for the ENERGY STAR label. Under these new rules, all components would need to undergo certification in order to be used in new computer systems for qualification for the ENERGY STAR label. The prerequisite of accredited lab data for all components and products would disallow historical efficiency and power factor PSU data from ECOS and the 80 PLUS® programs or other non-accredited labs to be considered in new computer desktop and server submissions. ECOS and their contracted third party test firm, EPRI, are not certified ISO or EPA accredited labs. However, ECOS and the 80 PLUS program for power supply certification have provided industry a database for technology product efficiency comparisons since 2005. ECOS has helped the industry agree on a process for testing and measuring power supply efficiency that industry has widely adopted, including the EPA, as well as offering an independent portal for efficient product comparison when making procurement considerations. Currently the 80 PLUS program lists reports and efficiency details for over 2700 models of PSUs from over 200 manufacturers as a building block ingredient for ENERGY STAR system qualification.

In lieu of retesting and certifying over 2700 PSUs for new computing products, CSCI recommends that those PSUs that have been measured by ECOS and certified as 80 PLUS be grandfathered into the ENERGY STAR program. CSCI proposes that ECOS offer the 80 PLUS certificate of compliance (CoC) as proof of compliance certifying qualification of the PSUs. In addition, computer and server manufacturers could then use this CoC as proof of PSU compliance for future ENERGY STAR products. ECOS will also provide an electronic copy of the results, including efficiency detail, manufacturer, model, unique ID, test date, etc with the CoC. This data is currently also available at http://www.80plus.org/manu/psu/psu_join.aspx. The computing products could then be submitted for the proposed qualification and certification. We propose that both ENERGY STAR auditors and certification bodies (CB) accept the proposed ECOS CoC from 80 PLUS as proof that the PSU meets ENERGY STAR requirements. This proposal would allow manufacturers to continue to design products that meet the ENERGY STAR requirements without delay following requalification of energy efficient PSUs. New PSU designs would undergo the above-described CoC qualification and certification process from ECOS similar to historical products.

Regarding possible delays in availability of ENERGY STAR computing products due to certification delays during the transition period, please note that unlike other product categories, the computer industry is committed to energy efficiency improvements not only in the manufacture of efficient products but also in the consumption and adoption of ENERGY STAR products. CSCI has member procurement requirements using ENERGY STAR as a baseline. It is important to recognize that disruptions in the availability of ENERGY STAR products could negatively impact these buying initiatives and in effect slow down the adoption rate of ENERGY STAR computers. Facilitating a transition period and resolving mutual data recognition agreements would achieve the enhancement goals while supporting the worldwide adoption of ENERGY STAR computer systems.

In addition, CSCI proposes that ENERGY STAR server specification eliminate the power factor requirement for PSUs less than 75W that was afforded to similar PSUs in V5.2 of the computer spec. Specifically on line 231 of the revised V5.2 Computer specification, those PSUs with less than maximum rated PSU output current of 75W do not specify a power factor requirement. CSCI requests that servers with PSUs with less than 75W maximum rated output current be allowed the same exclusion for power factor requirements.

Climate Savers Computing Initiative

The Climate Savers Computing Initiative is a non-profit group of eco-conscious consumers, businesses and conservation organizations working to decrease computing energy consumption. As participants in the Initiative, manufacturers commit to producing energy-efficient PCs, servers and software, and members commit to using computer power management and purchasing energy-efficient computers. The Initiative is also a resource for consumers and IT personnel to learn more about reducing the power footprint of their computers—without any resulting loss of productivity. Climate Savers Computing is global consortium, operating in 53 countries through nearly 600 members of large commercial buyers, consumers, industry stakeholders and conservation organizations dedicated to increasing the energy efficiency of IT computing equipment, increasing the adoption and deployment of power management, and shifting user behavior to smart computing practices through development, deployment and adoption of higher efficiency standards, criteria, technology and best practices.