Dear Mr. Fanara:

On behalf of 3PAR, thank you for the opportunity to provide feedback to the United States Environmental Agency’s Specification Framework Document for version 1.0 of the ENERGY STAR Enterprise storage program.

We have read the specification document and have one significant factor for the agency’s consideration. The enterprise IT market and the storage market specifically rely heavily on data management technologies to deliver power and cooling efficiencies that dwarf any savings from electromechanical developments. We have a saying at 3PAR: “The greenest drive is no drive at all”. We strive to deliver enterprise storage solutions that require 50% to 75% fewer disk drives to store the same logical capacity of information as legacy enterprise storage systems. This advance in power and cooling efficiency is achieved with data management software, specifically a form of virtualization software called ‘thin provisioning.’ We are concerned that the Energy Star program specification misses these types of innovations, and the market will be very under informed by the framework set forth in the specification.

We have begun to see utilities around the country understand and acknowledge the impact that virtualization software can have on the energy efficiency of data center storage devices, including Pacific Gas and Electric (PG&E), the power utility for Northern California:

“Storage virtualization and thin provisioning technologies help our customers realize significant capacity and cost savings while also addressing critical datacenter energy issues,” explained Mark Bramfitt, principal program manager for PG&E. “By providing financial incentives, we hope to increase industry adoption of these smart and efficient new storage technologies.”

3PAR urges you to consult with energy companies such PG&E and Austin Energy to understand the material energy efficiencies they have seen companies such as 3PAR deliver to their customers through innovative software technologies. We also welcome the opportunity to work with your agency directly to help include enterprise storage software in the framework.

Sincerely,

Craig Nunes
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Vice President of Marketing

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