Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Alliance to Save Energy
Northwest Power and Conservation Council
Northeast Energy Efficiency Partnerships

January 18, 2013

Mr. Robert Meyers
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

Subject: Comments regarding Version 6.0 Draft 3 Computer Specification

Dear Mr. Myers and ENERGY STAR team,

The above organizations are writing today to comment on Draft 3 of the ENERGY STAR v6.0 specification for computers. We commend EPA for the many improvements in the specification framework, such as including the energy usage of displays used for notebooks and integrated desktops, revising the categorization system and providing incentives for switchable graphics and high efficiency power supplies.

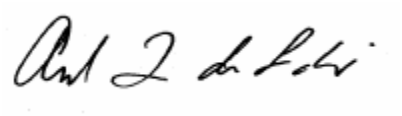
However, the allowances granted for discrete graphics cards (known as graphics "adders") seem to be based on outdated data, and are much higher – by a factor of approximately one to two – than justified by 2011 and 2012 market data. Recent studies by CLASP, NRDC and PG&E show that the power consumption of discrete graphics cards in idle mode has been reduced dramatically between 2010 and 2012. Given that approximately 30 percent of computers sold are equipped with discrete graphics cards and that graphics adders represent a large share of the total energy allowance (more than half in some cases), overly generous adders would lead computers with discrete graphics cards to benefit from very large unwarranted allowances, enabling many inefficient computers to qualify for ENERGY STAR. In order to preserve the integrity of the ENERGY STAR brand and ensure that consumers and businesses can rely on ENERGY STAR to identify the most energy efficient computers on the market, **we urge EPA to revise its proposed graphics adders based on 2011 and 2012 data from the CLASP, NRDC and PG&E studies.** Graphics adders based on 2011-2012 data would save US consumers and businesses an additional **$180 million annually** relative to the ENERGY STAR Draft 3 proposal.

In addition, an NRDC analysis of ENERGY STAR's 2011 and 2012 computer data indicates that the energy limits and discrete graphics allowances are significantly higher than justified by recent data. As such, the specification could result in higher market share than the program target of 25 percent in several computer categories. This would fail to drive the market to adopt the more efficient technologies available today, and would miss a large part of the energy saving opportunity associated with the use of these technologies. EPA indicated that its analysis is based on data from 2010 and part of 2011, and does not take into account 2012 models. With the specification due to be in effect in 2014 and 2015, 2010 data does not adequately represent the market that the specification is targeting. **We urge EPA to revise its analysis by taking into account 2011 and 2012 data from the ENERGY STAR Qualified Product List, and to exclude 2010 data which will no longer be relevant by 2014 and 2015 in a rapidly evolving market.** Revised levels based on NRDC's analysis of 2011 and 2012 data would save an additional **$250 million** annually relative to EPA's proposal.

Revised graphics adders and base energy allowances would save US consumers an additional **$430 million** in reduced electricity bills annually, eliminate the need for **one and a half power plants** worth of electricity and prevent an additional **2.3 million tons/yr of CO2** emissions annually as compared to the currently proposed specification.

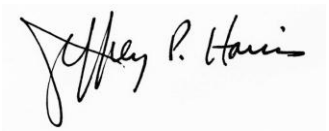
We thank EPA for the opportunity to provide input and for consideration of our comments.

Sincerely,



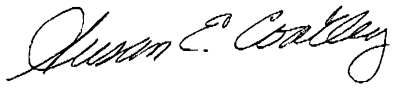
Andrew L. deLaski, Executive Director
Appliance Standards Awareness Project

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



Jeffrey Harris, Senior Vice President for Programs
Alliance to Save Energy

Tom Eckman, Manager, Conservation Resources
Northwest Power and Conservation Council



Susan E. Coakley, Executive Director
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