

June 3, 2011

EPA

Subject: Energy Star UPS Specification for UPSs, Draft 1 Version 1.0

The following are the comments from GE for the subject document:

1 B) Redundancy

Recommend not considering Redundancy at the system level (redundant modules). The various weighted load levels will account for the difference in loading. Modular UPSs would need to be tested in smallest and largest capacity configuration.

1 C)1) Normal Mode

Consider efficiency in normal mode only ... time spent in the stored energy mode is insignificant with respect to power consumption.

1 E)2) Direct Current DC

Recommend leaving the DC UPSs (Battery Chargers) separate from UPSs

1 G) Reference Test Load (footnote 5)

Do not believe UPS is allowed to be backfed into the input AC supply

2.1.1.i Included Products (Rotary UPS)

Rotary UPS has a much smaller backup time and is significantly different from standard double conversion. The only power consumption is what is required to spin the flywheel and losses due to resistance. Consider not including in the procedure. If included would require participation by Active Power, Piller, etc. Although highly efficient relatively short backup times.

Section 2.1 - Included Products

"Refurbished" and "used" are different. Refurbished equipment should have all consumable components replaced - fans, DC caps, AC caps, etc. Once refurbished, the equipment should be factory tested to meet original specifications. Otherwise, the inclusion of "refurbished" equipment in this spec will just help third party vendors out there unload the used UPSs in their warehouses.

3.2 Energy Efficiency Requirements for AC Output UPSs

Recommend keeping the UPS requirements separate from the DOE Battery Charging requirements

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Agree w/ APC proposed weighting

3.2 Energy Efficiency Requirements for AC Output UPSs (Note: line 183)

GE supports use of the ITI-CBEMA Curve. The curve may be old and based on older equipment (servers) but w/ newer improved equipment the tolerance of short duration outages (2-4 ms) should be better. Can't the equipment tolerate a loss of power of 4 ms, the duration it takes to switch a Static Switch?

3.2 Table 1 (line 178)

Recommend lowering the Minimum Average Efficiency for VFI. Un weighted calc for a 750 kVA results in 94.4% which is considered high. Curve says it is average.