

## **Comments from Piller on the proposed changes to the UPS specification and Test Methods for UPS**

Piller likes to thank EPA for the chance to comment the EPA and DOE memo from 3<sup>rd</sup> February.

We are able to agree to most of your items but have a comment regarding the energy metering.

### IEC 62053-21 Class 2 energy measurement accuracy

We fully understand the reasons to change the required accuracy from 5% to 2% from the ENERGY STAR<sup>®</sup> point of view.

But we have doubts that the 2% accuracy can be achieved with most standard power measurements integrated in a UPS. The 2% accuracy of a power measurement is not easy to achieve because it is the resulting accuracy of both voltage and current measurement.

So if the required accuracy will be changed from 5% to 2% we believe that many UPS manufacturers will not be able to use their already built in internal measurement any more and would need to buy additional equipment to be sold with the UPS. Because of the additional costs this might result in less UPS equipped with energy measurements on site.

We also believe that an accuracy of 5% should be sufficient to value the energy consumption of a data center. Even if this is not a high precision measurement it will still provide enough information to find energy saving potential and to see the results of energy saving measures.

### Rotary UPS

We also kindly like to ask you to include Rotary UPS into your specification and to take their typical load profile into consideration.

We are looking forward to continuing our cooperation with ENERGY STAR<sup>®</sup>

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