



March 14, 2008

Katharine Kaplan
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Dear Katharine:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following comments on the ENERGY STAR computer specification. These comments were developed based on the CEE Consumer Electronics Committee's discussion of the Draft 1 Version 5.0 ENERGY STAR computer specification distributed on February 22, 2008. Thank you for the chance to provide input on this document. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE is pleased to see the advancement of the specification to include Active State. In concept, the Energy Efficiency Performance Assessment Approach appears to be a good method for capturing the energy use of computers running workloads of real-world applications and computing tasks. We look forward to learning more when this approach is finalized and is ready to support data collection for establishing the new specification levels for computers.

There seems to be a good case for evaluating both game consoles and thin clients as separate products within this Version 5.0 computer specification. The products appear to have sufficiently unique characteristics to merit individual treatment, including possibly their own performance levels. In its evaluation of these products, CEE encourages EPA to seek out additional energy savings opportunities that may be afforded to consumers.

CEE supports the concept of including power management requirements in the specification. However, we have not convened technical experts qualified to comment on the specific provisions within the power management requirements, but understand that power management in general provides an excellent opportunity to save energy. Several members are conducting power management programs at this time and we expect there to be continuing interest in this approach.

Thank you again for the opportunity to comment. CEE looks forward to working with you as the computer specification continues to evolve. If you have any questions about these comments, please direct them to Margie Lynch, CEE Program Manager, at (617) 589-3949 ext. 231.

Sincerely,

A handwritten signature in black ink that reads "Marc J. Hoffman". The signature is written in a cursive, flowing style.

Marc Hoffman
Executive Director

Supporting Organizations

BC Hydro

Efficiency Vermont

New York State Energy Research and Development Authority

NSTAR Electric

Pacific Gas & Electric

Sacramento Municipal Utility District

Southern California Edison

Wisconsin Focus on Energy

Xcel Energy