

PSMA Energy Committee

Line 31 - We continue to encourage EPA to include battery charging systems in this specification as a very large portion of the external power supplies are chargers that overall account for well over 50% of the power consumed by these supplies as 1C to 2C charging current is constantly imposed on the battery load in many cases.

Line 161 - No load consumption criteria - I know that previous drafts had the same spec. But in reconsidering the spec, we now have an issue with this table. How did you arrive at a category of 10 to 250 watts? This might be acceptable for internal power supplies. However, we have an issue with the spec as external supplies above 100 watts require some preloading which will impose more power on the no-load power figure. We suggest the spec read as follows

10 to 100 watts ----- < 0.75 watt
100 to 250 watts ----- < data is required to establish maximum reasonable value

Line 124 - This has been brought up before however we wish to bring it up again. The specification allows for only defining two modes of operation - no load (assumed to mean zero power to the load) and active mode (defined as the average of 25%, 50% 75%, and 100% of nameplate full load power rating). This ignores the standby mode. Systems are now requiring very low power standby mode as directed by Executive Order 13221. Further many systems sit in this mode in a much larger proportion to their operating mode. So it is possible that power supplies qualified under this specification would actually spend most of their life operating in a completely unspecified mode per Energy Star criteria. Although this consumption may be low, it will probably not be as low as a written specification would drive them to be.

A final consideration to ponder - if the no load power is .75 watts max, that does not leave much for the load to have in a standby condition. This it is entirely possible that a system having a power supply compliant with Energy Star criteria will not meet the National standards for standby power consumption.

We are pleased to see that the EPA Energy Star program effort is working in concert with other organizations world wide and that you have included adopting the use of the efficiency level protocol and will be using one of those levels. We encourage you to continue working with other agencies toward a world wide single efficiency standard.