

Hi Rebecca,

Please find here our remarks about the Draft #4 of the EPA server specification for Energy Star. Sorry for the delay, we hope that they will be still taken into consideration.

First, we want to express again our appreciation to the EPA for taking the lead in setting energy efficiency specification for servers. We strongly believe that the Energy Star label will drive the industry towards more efficient equipment and will encourage innovation for the benefit of the whole industry. This initiative coupled with efforts on the DataCenter infrastructure will substantially decrease the energy consumption of the fast growing digital information sector.

Second, we recognize that the concept of server actually covers a series of fairly different devices. We appreciate the effort of clarification which has been done since the previous version of the specification draft, even it may create some additional complexity.

Third, as a first step, the emphasis on the power supply efficiency is wise and we encourage EPA to publish these specifications shortly even they do not capture the overall performance of servers. We understand that the aim is to introduce new versions of these specifications which will progressively expand their coverage to the overall performance of the servers.

Fourth, we appreciate that the requirements for the power supply efficiency follow the recommendations of the ECOS consulting-EPRI study sponsored by a consortium of utility led by PG&E with increasing requirements for more powerful equipment. We hope that the lowest class will rapidly be driven to a higher level of efficiency and that these requirements will be regularly up-dated to continue to drive improvement in the power supply equipment and architecture.

Fifth, we are concerned by the low requirement put on load factor. It is PG&E's policy not to offer energy efficiency incentives or rebates for products with power factor ratings below 95% at full load. This issue may therefore prevent us to support the Energy Star effort through our energy efficiency programs by providing incentives or rebates for Energy Star servers. Further, we believe that utilities in the western region of the country follow similar policies, given that we typically do not charge our customers for reactive power. Essentially, power factor correction is the responsibility of the utilities, who pass the costs on to all customers. We then encourage EPA to review the values of proposed load factors and increase them to a higher level. We propose, as a first step, that this intend be expressed in the TIER 2 description p. 19.

Thank you again for your efforts and leadership in that matter.

Best regards,

FX RONGERE
HighTech, BioTech, and HealthCare Segment
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