

ENERGY STAR Storage Specification Final Draft Comments from the European Commission

We appreciate our comments on the Draft 4 specification (regarding Table 2 and the Considerations for Future Revisions section) being taken on board. We recognise that the process to define ENERGY STAR program requirements for Data Center Storage Eligibility Criteria Version 1.0 is now at a late stage, but we hope that the following comments on the final draft, distributed June 20 2013, can still be taken into consideration:

General Comments

Market penetration: We previously requested that the EPA please publish the final data set and the data set % qualification rates for this specification, but this request has not received a response. We would also much appreciate a continued evaluation of future specification revisions on the basis of market and data set % penetration levels, to give clarity on the ambition of the specifications and ensure that only the best performing storage products continue to be qualified as ENERGY STAR.

Data submission: We strongly support the EPA in ensuring that non-anonymised data is published from the point the specification comes into effect, as: i) this final draft is even less stringent in terms of tolerances, ii) a number of approaches that would have resulted in energy efficiency gains have been edited out through the redraft process iii) the main goal of this specification seems to be to provide the data foundation for the subsequent revision.

Detailed Comments

Line 427 – Power modelling presale tool: We previously suggested the language in this section was modified in order that manufacturers comply – we suggested that this was stated more firmly as a “requirement” rather than an “expectation”. We understand that it would be difficult to comply with for some manufacturers and therefore the requirement was removed. We would then suggest that the requirement is included as a consideration for future revisions.

Line 762 – Documentation Requirements: The text here still refers to the PPDS, so this reference will need to be replaced, now that the PPDS will not be used.

Line 803 – Considerations for Future revisions: We would request that the rolling average calculation is listed as an inclusion that will be investigated for future revisions, as it is something that users are interested in and they may be able to find a solution to the issue of varying time scales for averages if it is indicated that this will be addressed in future.