| Topic | Subtopic | Comment Summary | EPA Response |
|---|---|---|---|
| General | Pass Rate | One stakeholder recommended that EPA target a pass rate of 15 to 20 percent of the ENERGY STAR QPL in order to account for likely increases in efficiency due to increasing adoption of the California Energy Commission minimum efficiency requirements by other states.<br><br>Industry partners requested that EPA target a pass rate of 33.7% based on analysis that this would align with 25% of the market in terms of shipments (as opposed to model availability). | EPA has targeted the top quartile of products in the ENERGY STAR dataset in the Final Draft specification. This incorporates the adjustments to the adder structure. As noted in the ENERGY STAR Guiding Principles, experience has shown that it is typically possible to achieve the necessary balance among the key principles of the program by selecting efficiency levels reflective of the top 25% of models available on the market when the specification goes into effect. These principles include ensuring national energy savings, maintaining product performance, reasonable payback period for consumers, and effectively differentiating products for consumers with the ENERGY STAR label. |
| General | Recertification | Industry stakeholders expressed the expectation that, pending EPA direction to CBs, only a small number of notebook computers that exhibit cyclical behavior would require retesting. Industry also commented that retesting should not be necessary for workstations, arguing that while mode weightings have changed the pass rate has increased. | EPA thanks stakeholders for the feedback that the impact of this test method change will be minimal on existing products. Given this feedback, EPA will require retesting for products impacted by this test method change. |
| Certification Criteria | Energy Efficient Ethernet | Two stakeholders commented that EPA should require energy efficient ethernet (EEE) to be enabled on all ports in Version 8.0 as opposed to waiting to require this in Version 9.0. Stakeholders cited the long lead time industry has had to prepare for this change and the low cost to enable EEE in a compatible port. Given the relative ease of implementation, commenters argued, there is no reason to delay the requirement. | EPA shares the goal of having all EEE ports enabled as-shipped as soon as possible, but given the current state of the market, the Agency is not comfortable removing nearly 1/3 of products which otherwise meet the Version 8.0 requirements due to this single issue. EEE is now required to be present in all 1Gbs or faster Ethernet ports in Version 8.0, with the expectation that all will be enabled in all products in Version 9.0. |
| Certification Criteria | External Power Supplies | Industry proposed aligning allowances for computers with External Power Supplies with those for Internal Power Supplies and provided proposed allowances. | EPA does not have any data indicating the benefit that the program would accrue from this type of incentive. Nor is the Agency aware of any data that exists from other programs, such as EPEAT, which currently already incentivizes pushing beyond federal requirements. Given that many products seeking ENERGY STAR certification are also seeking EPEAT recognition, EPA believes there is already enough incentive in place. |
| Certification Criteria | Internal Power Supplies | One stakeholder and utility partners expressed support of the ten percent load requirements for internal power supplies and EPA's proposal to maintain respective 80 PLUS Bronze and 80 PLUS Gold equivalent levels at other load points.<br><br>Industry partners recommended combining desktops with integrated desktops, aligning with 80 PLUS levels, and specifying an efficiency of 80% at the ten percent load point for all cases except aligning with 80 PLUS Titanium for power supplies with greater than 500W output, which requires 90%. | EPA received a variety of comments regarding internal power supply testing over the course of this specification development process and believes that the criteria and incentive structure is an appropriate compromise for all stakeholders. EPA considered the incentive structure that stakeholders proposed and believes that there is enough incentive in place, by reducing the TEC as part of the test method, for 80Plus Silver and Gold equivalent products. However, EPA has maintained the incentive structure for 80Plus Platinum and Titanium as the Agency believes that this remains an opportunity to transform the market. |