![NRDC - Natural Resources Defense Council logo]

August 16, 2019

Mr. Ryan Fogle
United States Environmental Protection Agency
ENERGY STAR Program
1200 Pennsylvania Ave NW
Washington, DC 20460

**Subject: NRDC Comments on ENERGY STAR Computers Version 8.0 Draft 2**


Dear Mr. Fogle,

On behalf of the Natural Resources Defense Council (NRDC) and our more than 1.3 million members and online activists, we respectfully submit the following comments in regard to the ENERGY STAR Computer Version 8.0 Draft 2.

NRDC has been an active participant in the development of ENERGY STAR specifications for computers for over a decade. Computers are the second largest electricity end-use among electronic devices after televisions, roughly on par with all data centers in the United States. Large and cost-effective energy saving opportunities remain for computers, as demonstrated in NRDC's 2016 study "Slashing Energy Use in Computers and Monitors While Protecting Our Wallets, Health, and Planet".[1] As such, improving computer energy efficiency is an important measure to save American consumers and businesses money on their utility bills, supporting America's economic competitiveness, and supporting job growth, all while reducing greenhouse gas emissions.

NRDC strongly supports EPA's efforts to update the computer specification to version 8. We generally support Version 8.0 draft 2, with the following comments.

**1. NRDC supports the removal of the Energy Efficient Ethernet (EEE) adder. However, EPA should require that EEE is enabled on all ports in version 8.0, not in version 9.0**

The EEE adder has been in place since 2012 or longer, providing a long on-ramp for industry to prepare for EEE becoming required. We acknowledge industry's concern that some of the products currently qualified may fail if EEE becomes required, but given the urgency of combatting climate change, and the long lead time that industry has already had to prepare for this change, it is not appropriate to wait until version 9, which could mean an extra three to five

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[1] Delforge P., July 2016, https://www.nrdc.org/resources/slashing-energy-use-computers-and-monitors-while-protecting-our-wallets-health-and-planet

years or longer, for making this simple requirement that most computers already support today mandatory for ENERGY STAR qualification. Having EEE disabled is a clear case of unwarranted energy waste that has no place in a leadership program like ENERGY STAR.

**2. NRDC strongly supports EPA's proposal to maintain 80Plus Bronze requirements for internal power supplies, with an additional 10% load efficiency requirement of 0.80.**

The 10-percent load efficiency requirement is one of the most important features of the computer specification from an energy saving perspective, because power supplies are one the highest energy users in computers, and setting mandatory requirements guarantee higher energy savings than performance specifications with a large number of functional adders can in a rapidly evolving technology market.

EPA's proposal is slightly less stringent than NRDC's recommendation of 0.81 efficiency and of extending its applicability to all power supplies vs. just those rates 500 watts or less. However, we still strongly support this positive and important step forward.

**3. NRDC supports the incentive for full network connectivity for desktops that use 2.5 watts or less in connected standby mode, and no incentive for integrated desktops and notebooks.**

Accelerating market adoption of low-power connected standby mode in desktops is a major energy saving opportunities in computers, which warrants a significant incentive. NRDC supports EPA's proposal. However, we would not support a power limit higher than 2.5 watts which would be unwarranted given current technology.

Thank you for the opportunity to participate in this specification development process and for your consideration of our comments.

Sincerely,

Pierre Delforge
Senior Scientist
Natural Resources Defense Council