

ENERGY STAR Program Requirements for Computers – V. 5.0 – Draft Final – Comments from the ECESB

We present in the following a summary of comments from the European Community Energy Star Board (ECESB) on ENERGY STAR Program Requirements for Computers – V. 5.0 – Draft Final. The comments are public.

Definition of categories

The ECESB believes that the categories should be based on functionality such as office productivity and rich media, and based on the functionality the hardware requirements should be specified. Therefore, the ECESB recommends that the type of functionality is stated for each of the categories.

TEC – Typical Electricity Consumption

The ECESB does not see the real benefit in using the TEC instead of the modes approach. If a TEC approach should be used, the ECESB recommends using a real duty cycle simulating the full usage from work to off. This should reflect the normal usage of the computer and should show the impact of the computer's power management, both regarding the individual components and the whole computer going into sleep. This should be considered for Tier 2.

The ECESB suggests for this Tier an off and sleep mode requirement to secure that the achievements from the current specification of regarding low off mode consumption will not be lost.

Adders

The ECESB is not in favour of using adders. This focus on individual components conflicts with the intention of giving manufacturers flexibility to achieve energy efficiency by whatever means in their product designs and these adders may become rapidly outdated in this fast moving area. Components should be powered down substantially when the computer is in idle mode, and adders would provide a disincentive to this type of component level power management. The working group has a strong preference for product variations to be addressed via the category approach, without use of adders.

If adders are retained in the final version, the value of the adders should not be based on average consumption values for the components, but the 25 % most efficient part of the market as is the case for the qualification level as a whole.

For the version 5.0 specification, as a minimum, the ECESB recommends removal of the memory adder because it is small, and would facilitate simplification of the specification.

Proxying

The ECESB supports the concept of full network connectivity, however, is also concerned with the proxying concept, because the standard is not yet in place.

The ECESB recommends that both the EPA and the EC should approve the standard after stakeholder consultation.

Text for declaration of modal values

The ECESB recommends that it be stated very clearly that the power values in off, sleep and idle must be declared when registering the product , and that it should be made clear which adders have been applied. The ECESB recommends that a text is included in item 16 of the test procedure: “Reporting Test Results. The TEC and the power values measured in off, sleep and idle must be reported together with all relevant product data including category and adders applied to ...”

The ECESB furthermore recommends that the manufacturers are recommended to include the modal power values and the TEC in the manufacturer’s product data.