



KYLE PITSOR

Vice President, Government Relations

May 11, 2017

VIA EMAIL TO: ups@energystar.gov

Mr. Ryan Fogle
Environmental Protection Agency
ENERGY STAR UPS Program Manager
1200 Penn. Ave NW 6202J
Washington, DC 20460

**NEMA Comments on ENERGY STAR® Program Uninterruptible Power Supplies (UPS)
Draft Specification 1.1**

Dear Mr. Fogle,

As the leading trade association representing the manufacturers of electrical and medical imaging equipment, the National Electrical Manufacturers Association (NEMA) provides the attached comments on the Environmental Protection Agency's ENERGY STAR® Uninterruptible Power Supplies (UPS) Draft Specification 1.1. These comments are submitted on behalf of NEMA Power Electronics Division Member companies.

NEMA, founded in 1926 and headquartered in Arlington, Virginia, represents nearly 400 electrical and medical imaging manufacturers. Our combined industries account for more than 350,000 American jobs and more than 6,500 facilities across the U.S. Domestic production exceeds \$117 billion per year. Please find our detailed comments attached.

Our Member companies count on your careful consideration and we look forward to an outcome that meets their expectations. If you have any questions on these comments, please contact Alex Boesenber of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor". The signature is written in a cursive, flowing style.

Kyle Pitsor
Vice President, Government Relations

NEMA Comments on ENERGY STAR® Uninterruptible Power Supplies (UPS) Draft Specification 1.1

1. NEMA understands the need for the EPA to update the ENERGY STAR UPS program in view of new Federal test procedures for certain UPS products and related product definitions. At the same time we wish to inform the EPA of the significant concerns raised by NEMA during the Department of Energy rulemaking proceeding which established the definitions and test procedures for UPS products. A copy of NEMA's comments to DOE is provided by footnote reference here¹. Unfortunately, most of NEMA's comments were overlooked by the DOE. The most significant concern NEMA has is with respect to the definition of a UPS. We go into greater detail on this concern in item 3 below.

2. In addition to our preceding comments to DOE about UPS definitions and standards, we wish to bring to EPA's attention to an issue regarding the definition of a Voltage Independent UPS. As defined by the DOE², a VI UPS means a "UPS that produces an AC output within a specific tolerance band that is independent of under-voltage or over-voltage variations in the input voltage. The output frequency of a VI UPS is dependent on the input frequency, similar to a voltage and frequency dependent system." [Emphasis added] The internationally recognized definition in IEC Standard 62040-3 states that a VI UPS be able to protect against BOTH under- and over-voltage. Less expensive units protect only against under-voltage and distract the market from implementing better, internationally compliant products. We request EPA to disregard DOE's definition of a VI UPS and instead utilize the definition of a VI UPS found in IEC 62040-3 Edition 2.

3. Finally, we reiterate our opposition to any definition of a UPS product that begins with the words "is a battery charger", as recently defined by the DOE, and we encourage the EPA to avoid this confusing and misleading characterization. Creating a new definition can only lead to consumer confusion: a consumer visits the EPA website and will search for "UPS" not "battery charger" when looking for information about UPS products. Definitions about battery chargers will be very confusing to consumers if that is what he/she finds from the UPS product search on the EPA Energy Star site. NEMA is concerned that such confusion could lead to a whole-scale market unacceptance of the ENERGY STAR mark on UPS units equipped with a NEMA 5-15 or 1-15 plug.

4. We note to the EPA that we are still developing comments specific to draft 1 of the v2.0 UPS specification and we will submit these at a later date.

¹ <http://www.nema.org/Policy/Pages/Rulemaking-Comments.aspx#DOE> There are several comments documents posted here related to the DOE Battery Chargers and UPS rulemakings.

² <https://www.regulations.gov/document?D=EERE-2016-BT-TP-0018-0010>