

**From:** Charles Wise  
**Sent:** Monday, February 25, 2008 2:58 PM  
**To:** FN-OMB-OFPP Green  
**Subject:** Proposed OFPP Policy Letter

Subject:  
Proposed OFPP Policy Letter - OFPP Green Products and Services - policy letter comments

Backdrop:

- The Office of the Federal Environmental Executive states that PCs and monitors account for 5-13% of total organizational electrical consumption.
- Gartner Research Group, in its September 2007 study, states that PCs and monitors account for 40% of total IT electrical consumption – compared to 23% for servers and data centers.
- The Dec, 2004 DOE study entitled, “Energy Consumption by Office and Telecommunications Equipment in Commercial Building, Volume II: Energy Savings Potential” reports that computing and telecommunication devices account for 97TWh of non-residential energy consumption, and further states that, “[Centralized] Network software that enables power management for networked office equipment has the greatest savings potential of all the measures selected for further study,” and that, “... applied to all relevant equipment, it could reduce total [Annual Energy Consumption] by between [21 and 30%]”

Commercial technology exists - and is already in use in some areas of the Federal government - that centrally measures, manages, and reduces the electrical consumption of networked PCs and monitors. Beyond optimizing native Energy Star low power state functions, this technology can accurately report energy data in before-and-after electrical consumption scenarios as part of a concerted PC power management energy efficiency initiative. This technology has also been employed as a guaranteed savings measure in alternatively financed projects such as Energy Savings Performance Contracts (ESPCs) and Utility Energy Savings Contracts (UESCs).

Conclusion:

All Federal agencies, in addition to purchasing most-efficient EPEAT certified hardware, should be required to develop a structured energy efficiency plan to both manage and measure the savings impact of Energy Star low power states in PCs and monitors. As with any traditionally metered efficiency measure, Measurement & Verification (M&V) is a critical component of a comprehensive PC power management initiative in ensuring compliance, persistence, and optimized energy use reduction.

Comments:

Policy Letter – Federal Register 12-28-07 pp.73904-73909  
(\*suggested language modifications are inserted in [brackets])  
p.73905

1. *Purpose*

“...Energy Star and those products [and technologies which optimize] lowest watt stand-by power;”

p.73906

8. *Responsibilities*

A(1)(c) “Energy Star, FEMP-designated, and those electronic products [and technologies which optimize] lowest available stand-by power...”

A(2)(b) “Life cycle cost analysis [and verifiable energy baseline data collection];”

A(4)(a) “Provide mechanisms for reporting on the effectiveness of the program [and, wherever possible, include verifiable energy baseline data collection] to demonstrate compliance;”

A(4)(b) “Achievement of best value based on life cycle cost assessments [and quantifiable energy consumption] of cradle-to-grave...”

p.73907

8. *Responsibilities* (cont.)

A(8)(b) “[centrally manages, enables, and measures the lowest watt stand-by power] on agency computers and monitors,”

Additional Comments:

Green product and efficiency standards in existing 3<sup>rd</sup> party service contracts:

The 3<sup>rd</sup> bullet down on p. 73905 (“Supplementary Information”) requires agencies to apply policy letter requirements to new and re-competed service contracts. Agencies are only “encouraged” to incorporate these requirements, however, into existing contracts as they are modified or extended through options. Given the significant % of PCs, monitors, and other green products and services currently managed under long-term service contracts, agencies and 3<sup>rd</sup> party service providers should be required to immediately incorporate policy letter requirements into existing contracts. Lacking such a requirement, many of the functional and beneficial outcomes outlined in the policy letter will not be realized for many years.

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