



# ENERGY STAR® Program Requirements for Data Center Storage

## Eligibility Criteria Draft 4 Version 1.0

1 Following is the Draft 4 ENERGY STAR Version 1.0 product specification for Data Center Storage. A  
2 product shall meet all of the identified criteria if it is to earn the ENERGY STAR.

3 **Note:** EPA has developed Draft 4 to use the Emerald™ Version 2.0 test specification. EPA is aware of  
4 ongoing testing to verify the performance of some aspects of Emerald Version 2.0 and reserves the right  
5 to revert to Emerald Version 1.0 based on its interpretation of the results of this testing. If reverting is  
6 necessary, EPA will notify stakeholders of the decision prior to the publication of the Final Draft of  
7 ENERGY STAR Version 1.0 for Data Center Storage.

## 8 1 DEFINITIONS

### 9 A. Product Types:

- 10 1) Storage Product: A fully-functional storage system that supplies data storage services to  
11 clients and devices attached directly or through a network. Components and subsystems that  
12 are an integral part of the storage product architecture (e.g., to provide internal  
13 communications between controllers and disks) are considered to be part of the storage  
14 product. In contrast, components that are normally associated with a storage environment at  
15 the data center level (e.g., devices required for operation of an external SAN) are not  
16 considered to be part of the storage product. A storage product may be composed of  
17 integrated storage controllers, storage devices, embedded network elements, software, and  
18 other devices. For purposes of this specification, a storage product is a unique configuration  
19 of one or more SKUs, sold and marketed to the end user as a Storage Product.
- 20 2) Storage Device: A collective term for disk drives (HDDs), solid state drives (SSDs), tapes  
21 cartridges, and any other mechanisms providing non-volatile data storage. This definition is  
22 specifically intended to exclude aggregating storage elements such as RAID array  
23 subsystems, robotic tape libraries, filers, and file servers. Also excluded are storage devices  
24 which are not directly accessible by end-user application programs, and are instead  
25 employed as a form of internal cache.
- 26 3) Storage Controller: A device for handling storage request via a processor or sequencer  
27 programmed to autonomously process a substantial portion of I/O requests directed to  
28 storage devices (e.g., RAID controllers, filers).

### 29 B. Storage Product Connectivity:

- 30 1) Direct-attached Storage (DAS): One or more dedicated storage devices that are physically  
31 connected to one or more servers.
- 32 2) Network Attached Storage (NAS): One or more dedicated storage devices that connect to a  
33 network and provide file access services to remote computer systems.

34 3) Storage Area Network (SAN): A network whose primary purpose is the transfer of data  
35 between computer systems and storage devices and among storage devices. A SAN consists  
36 of a communication infrastructure, which provides physical connections, and a management  
37 layer, which organizes the connections, storage devices, and computer systems so that data  
38 transfer is secure and robust.

39 C. Capacity Optimizing Methods (COMs): The reduction of actual data stored on storage devices  
40 through a combination of hardware and / or software. Common COMs include:

41 1) Thin Provisioning: A technology that allocates the physical capacity of a volume or file system  
42 as applications write data, rather than allocating all the physical capacity at the time of  
43 provisioning.

44 **Note:** EPA has made a small revision to the thin provisioning definition based on stakeholder feedback  
45 from Draft 3, changing the word "reallocating" to "allocating" to reflect actual system functionality. EPA  
46 welcomes feedback on the change made to this definition.

47 2) Data Deduplication: The replacement of multiple copies of data – at variable levels of  
48 granularity – with references to a shared copy in order to save storage space and/or  
49 bandwidth.

50 3) Compression: The process of encoding data to reduce its size. For the purpose of this  
51 specification, only lossless compression (i.e., compression using a technique that preserves  
52 the entire content of the original data, and from which the original data can be reconstructed  
53 exactly) is recognized.

54 4) Delta Snapshots: A type of point-in-time copy that preserves the state of data at an instant in  
55 time by storing only those blocks that are different from an already existing full copy of the  
56 data.

57 D. Storage Taxonomy<sup>1</sup>: A categorization scheme for use in segmenting the data center storage  
58 market by end-use application and key product characteristics. The major categories of the  
59 taxonomy that are referenced in this document are as follows:

60 1) Online Storage: Storage products that are intended to service a mixture of Random and  
61 Sequential I/O requests with a short response time. All data stored in Online storage must be  
62 accessible in ≤ 80 ms, unless the storage product is in a Deep Idle state. Online storage is  
63 typically comprised of one or more HDDs or SSDs and a storage controller, and provides  
64 primary data storage to supplement a Computer Server's internal memory.

65 2) Near-online Storage: Storage products that are intended to service a mixture of Random and  
66 Sequential I/O requests with a short to moderate response time. Near-online storage  
67 products offer an asymmetrical response; a portion of data may be accessible in ≤ 80  
68 milliseconds, while other data may be accessible in > 80 milliseconds.

69 3) Virtual Media Library: Storage products that are intended to service primarily Sequential I/O,  
70 with a short response time. The media in a Virtual Media Library (e.g., HDD, optical disk) is  
71 not designed to be physically removed from the system. All data stored in the Virtual Media  
72 Library must be assessable in ≤ 80 ms, unless the storage product is in a Deep Idle state.  
73 Virtual Medial Libraries are intended primarily for moderate and long term data storage.

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<sup>1</sup> The ENERGY STAR storage taxonomy is consistent with the taxonomy developed by the Storage Networking Industry Association Green Storage Initiative as defined in "SNIA Emerald™ Power Efficiency Measurement Specification" Version 2.0 rev 1 4 October, 2012. Further detail may be found at [www.snia.org/green](http://www.snia.org/green).

- 74 4) Removable Media Library: Storage products that are intended to service primarily Sequential  
75 I/O, with a moderate to long response time. The media (e.g., tape cartridge, optical disk) in a  
76 Removable Media Library is designed to be physically removed from the storage product.  
77 Removable Media Libraries are intended primarily for long term data archiving.
- 78 5) Adjunct Storage Products: Products which closely support storage devices by adding in real  
79 time value or additional control capabilities not present in the storage device(s) itself.  
80 Examples include SAN based virtualization controllers, NAS gateways, or other storage  
81 services. A key feature of these products is that no end user data is primarily stored on  
82 Adjunct Storage products, though data may be held in cache or other working buffers.
- 83 6) Interconnect Element: Devices which provide for interconnection functionality within a storage  
84 area network. Examples include SAN Switches, etc.

85 E. Other Data Center Equipment:

- 86 1) Computer Server: A computer that provides services and manages networked resources for  
87 client devices (e.g., desktop computers, notebook computers, thin clients, wireless devices,  
88 PDAs, IP telephones, other computer servers and other network devices). Computer servers  
89 are sold through enterprise channels for use in data centers and office/corporate  
90 environments. Computer servers are primarily accessed via network connections, versus  
91 directly-connected user input devices such as a keyboard or mouse. For purposes of this  
92 specification, a computer server must meet all of the following criteria:
- 93 i) is marketed and sold as a computer server;
  - 94 ii) is designed for and listed as supporting computer server operating systems (OS) and/or  
95 hypervisors, and is targeted to run user-installed enterprise applications;
  - 96 iii) provides support for error-correcting code (ECC) and/or buffered memory (including both  
97 buffered DIMMs and buffered on board (BOB) configurations)
  - 98 iv) is packaged and sold with one or more ac-dc or dc-dc power supplies; and
  - 99 v) is designed such that all processors have access to shared system memory and are  
100 visible to a single OS or hypervisor.

101 **Note:** The revised Computer Server definition presented here is from the Final Draft Version 2.0  
102 ENERGY STAR Computer Server specification.

- 103 2) Network Equipment: A device whose primary function is to provide data connectivity among  
104 an arbitrary combination of devices connected to its several ports. Data connectivity is  
105 achieved via the routing of data packets encapsulated according to Internet Protocol, Fibre  
106 Channel, InfiniBand or other standard protocol. Examples of network equipment commonly  
107 found in data centers are routers and switches.
- 108 3) Power Distribution Unit (PDU): A single- or three-phase power strip designed for data center  
109 use. A PDU may include instrumentation for metering power input and output, switched  
110 outlets for control of individual receptacles, or other advanced features.
- 111 i) Intelligent Power Distribution Unit (iPDU): A PDU with additional functionality to provide  
112 operational measurements of power consumption and environmental temperature.
- 113 4) Blade Storage: A storage product that is designed for use in a blade chassis. A blade storage  
114 product is dependent upon shared blade chassis resources (e.g., power supplies, cooling) for  
115 operation.
- 116 5) Cache: Temporary storage used to transparently store transitory data and which is not  
117 directly addressable by end-user applications. Primarily used for expediting access to or from  
118 (typically) slower devices.

119 **Note:** EPA has replaced the term "media" with "devices" in the Cache definition to be consistent with  
120 other definitions within this section that reference similar "devices".

121 F. Capacity: Capacity is reported in units of either binary bytes (1 MiB = 1,048,576 Byte) or decimal  
122 bytes (1 MB = 1,000,000 Byte).

- 123 1) Assigned Capacity: The amount of space on a system or data container which has been  
124 allotted to be written by an end user or application. (Note: For thin provisioning systems, an  
125 assigned capacity number represents a promise that that amount of space will be provided on  
126 demand; usable capacity is allocated as the container is written too. For fully-provisioned  
127 systems, usable capacity must be committed at the same time the container is allocated.)
- 128 2) Effective Capacity: The amount of data stored on a storage product, plus the amount of  
129 unused formatted capacity in the system.
- 130 3) Formatted (Usable) Capacity: The total amount of bytes available to be written after a storage  
131 product or storage device has been formatted for use (e.g., by an object store, file system or  
132 block services manager). Formatted capacity is less than or equal to raw capacity. It does not  
133 include areas set aside for system use, spares, RAID parity areas, checksum space, host- or  
134 file system-level remapping, "right sizing" of disks, disk labeling and so on. However,  
135 formatted capacity may include areas that are normally reserved – such as snapshot set-  
136 asides – if these areas may be configured for ordinary data storage.
- 137 4) Free Space: The amount of unused, formatted capacity as reported by the storage product.
- 138 5) Raw (Addressable) Capacity: The sum total amount of addressable capacity of the storage  
139 devices in a storage product. The raw capacity of a storage device is commonly understood  
140 to be the number of bytes available to be written via SCSI or equivalent protocol. It does not  
141 include unaddressable space, ECC (error correcting code) data, remap areas, inter-sector  
142 gaps, etc.

143 G. Operational States:

- 144 1) Active State: The state in which a storage product is processing external I/O requests.
- 145 2) Idle State: An operational state in which the storage product is capable of completing I/O  
146 transactions, but no active I/Os are requested or pending. The system may, however, be  
147 servicing self-initiated I/Os from background data protection and cleansing, and other  
148 operations not initiated by the user.
  - 149 i) Ready Idle: The state in which a storage product is able to respond to arbitrary I/O  
150 requests within the MaxTTFD limits for its taxonomy category, but is not receiving  
151 external I/O requests. The storage product may perform routine housekeeping tasks  
152 during Ready Idle, provided such operations do not compromise the product's ability to  
153 meet MaxTTFD requirements.
  - 154 ii) Deep Idle: A state in which one or more storage product components or subsystems have  
155 been placed into a low-power state for purpose of conserving energy. A storage product  
156 in Deep Idle may not be able to respond to I/O requests within the MaxTTFD limits for its  
157 taxonomy category, and may need to perform a managed 'wake-up' function in order to  
158 return to a Ready Idle or Active State. Deep Idle capability must be a user-selected,  
159 optional feature of the storage product.

160 H. Power Supply Unit (PSU): A device that converts ac or dc input power to one or more dc power  
161 outputs for the purpose of powering a storage product. A storage PSU must be self-contained  
162 and physically separable from the system and must connect to the system via a removable or  
163 hard-wired electrical connection. Note: Storage PSUs may be Field Replaceable Units (FRUs),  
164 but in some cases may be further integrated with the storage product.

- 165 1) Ac-Dc Power Supply: A PSU that converts line-voltage ac input power into one or more dc  
166 power outputs.
- 167 2) Dc-dc Power Supply: A PSU that converts line-voltage dc input power to one or more dc  
168 power outputs. For purposes of this specification, a dc-dc converter (also known as a voltage  
169 regulator) that is internal to a storage product and is used to convert a low voltage dc (e.g., 12  
170 V dc) into other dc power outputs for use by storage product components is not considered a  
171 dc-dc power supply.
- 172 3) Single-output Power Supply: A PSU that is designed to deliver the majority of its rated output  
173 power to one primary dc output. Single-output PSUs may offer one or more standby outputs  
174 that remain active whenever connected to an input power source. For purposes of this  
175 specification, the total rated power output from all additional PSU outputs that are not primary  
176 and standby outputs shall be less than 20 watts. PSUs that offer multiple outputs at the same  
177 voltage as the primary output are considered single-output PSUs unless those outputs (1) are  
178 generated from separate converters or have separate output rectification stages, or (2) have  
179 independent current limits.
- 180 4) Multi-output Power Supply: A PSU that is designed to deliver the majority of its rated output  
181 power to more than one primary dc output for the purpose of powering a storage product.  
182 Multi-output PSUs may offer one or more standby outputs that remain active whenever  
183 connected to an input power source. For purposes of this specification, the total rated power  
184 output from all additional PSU outputs that are not primary and standby outputs must be  
185 greater than or equal to 20 watts.
- 186 5) Redundant Power Supplies: Two or more PSUs that are configured to maintain uninterrupted  
187 output load in the event of failure of one PSU.
- 188 I. Product Family: A group of models/configurations that share a set of common attributes that are  
189 variations on a basic design.
- 190 1) Common Product Family Attributes: A set of features common to all models/configurations  
191 within a product family that constitute a common basic design. All models/configurations  
192 within a product family must share the following:
- 193 i) made by the same manufacturer;
- 194 ii) be from the same model line or machine type;
- 195 iii) utilize the same model of storage controller;
- 196 iv) fall under the same taxonomy category; and
- 197 v) contain equal or greater amount of cache than the corresponding qualified configuration.
- 198 2) Optimal Configuration: A product configuration that lies between the minimum and maximum  
199 qualified configurations and is representative of a product with maximum sellable energy  
200 efficiency performance (performance/watt) for a given workload. This configuration is  
201 provided by the manufacturer and can be optimized for the following workload types:

202 **Note:** EPA has clarified that the maximum sellable energy efficiency performance in the Optimal  
203 Configuration is measured in performance/watt. The specific unit for performance varies depending on the  
204 type of Optimal Configuration (e.g. I/O per second, MB per second, and GB per second)

- 205 i) Transaction: A workload optimized for random I/O usage measured in I/O per second per  
206 watt;
- 207 ii) Streaming: A workload optimized primarily for sequential I/O usage, measured in MB per  
208 second per watt;
- 209 iii) Capacity: A workload optimized for maximum storage as measured by GB per watt.

- 210 3) Maximum Qualified Configuration (Default): A product configuration that includes the  
211 combination of base components that generates a system which is 5% larger in storage  
212 device count than the optimal configuration.
- 213 i) For Online 3 and Online 4 systems, the number may be rounded up to the nearest drawer  
214 boundary.
- 215 ii) Drawer rounding is not applicable to Online 2 systems.
- 216 4) Minimum Qualified Configuration (Default): A product configuration that includes the  
217 combination of base components that generates a system which is 20% smaller in storage  
218 device count compared to the optimal configuration.
- 219 i) For Online 3 and Online 4 systems, the number may be rounded down to the nearest  
220 drawer boundary.
- 221 ii) Drawer rounding is not applicable to Online 2 systems.

222 **Note:** EPA has renamed the Maximum and Minimum Configurations to Maximum and Minimum Qualified  
223 Configurations, as stakeholder feedback suggested the previous names were unclear and could be  
224 mistaken as actual system maximum and minimum capability rather than the configurations that are  
225 chosen specifically for ENERGY STAR certification.

226 Drawer rounding in the maximum and minimum qualified configurations is applicable to Online 3 and  
227 Online 4 systems only. Stakeholder feedback stated that the previous 150 storage device limit in Draft 3  
228 was too restrictive for some Online 3 systems.

229 The following is an example to illustrate this Product Family approach and related concepts:

230 **Example:** A manufacturer submits a transaction optimized system with an Optimal Configuration of 192  
231 storage devices, 16 drawers containing 12 storage devices each. The calculated range of ENERGY  
232 STAR qualification for this system, without rounding, is 154 to 202 storage devices. The resulting size of  
233 the qualified product family after drawer rounding would be 144 to 204 storage devices, or 12 to 17  
234 drawers containing 12 storage devices each.

- 235 5) Expanded Maximum Qualified Configuration (Optional): A manufacturer may submit  
236 additional physical data points using configurations which contain a number of Storage  
237 Devices higher than the required Maximum Qualified Configuration defined above if the  
238 expanded performing point is within 15% of the Optimal Configuration performance  
239 (performance/watt). The required Maximum Qualified Configuration point above can be  
240 replaced with this new higher count of storage devices.
- 241 i) Performance will be measured using the appropriate relative weighting of workloads  
242 defined in Table 6.
- 243 ii) Modeled data may not be used in Expanded Maximum Qualified Configuration  
244 submissions.
- 245 6) Expanded Minimum Qualified Configuration (Optional): A manufacturer may submit  
246 additional physical data points using configurations which contain a number of Storage  
247 Devices less than the required Minimum Qualified Configuration defined above if the  
248 expanded performing point is within 15% of the Optimal Configuration performance  
249 (performance/watt). The required Minimum Qualified Configuration point above can be  
250 replaced with this new lower count of storage devices.
- 251 i) Performance will be measured using the appropriate relative weighting of workloads  
252 defined in Table 6.

253 ii) Modeled data may not be used in Expanded Minimum Qualified Configuration  
254 submissions.

255 **Note:** EPA received stakeholder requests to add an expanded maximum qualified configuration modeled  
256 after the existing expanded minimum qualified configuration in Draft 3. After further discussion with  
257 stakeholders regarding this request, the allowable change of performance when expanding both the  
258 maximum and minimum qualified configurations has been increased to 15%. EPA welcomes stakeholder  
259 feedback on these proposed revisions. This change will enable a more representative range of product  
260 sizes to qualify, therefore providing more information to end-users about the behavior of their storage  
261 systems both below and above the optimally-sized point.

- 262 7) Systems Composed of Combinations of Single Device Optimal Configurations: A product  
263 family which has demonstrated more than one Optimal Configuration may be sold as  
264 ENERGY STAR qualified using a combination of those Optimal Configurations, provided **all**  
265 of the following apply:
- 266 i) Combined systems are configured using only those storage devices, or validated  
267 replacement storage devices (Section 3.6), and configuration options which were used in  
268 the individual qualified Optimal Configurations.
  - 269 ii) The combined system consists of percentage allocation of storage devices, or validated  
270 replacement storage devices (Section 3.6), from one or more Optimal Configurations.
  - 271 iii) The total sum of all percent allocations of storage devices drawn from the Optimal  
272 Configurations must equal 100%.
  - 273 iv) After allocation, storage devices and drawers are rounded per the Maximum and  
274 Minimum Qualified Configuration rules above.
  - 275 v) When rounding to a drawer, storage devices are added or removed (as appropriate) to  
276 maintain storage device percentages in the same proportion as the proportion used in the  
277 combined system configuration prior to drawer rounding.
  - 278 vi) Allocation of Optimal Configurations is also used when a storage product provides Block  
279 I/O capability in addition to NAS capabilities. In this usage, the system wide percentage of  
280 defined allocations will include the portion of the system providing NAS functionality.  
281 There are no constraints on the size of the NAS portion of the system.
  - 282 vii) Multiple transaction or streaming optimizations may be submitted to incorporate different  
283 storage device technologies and customer usage needs.

284 **Note:** EPA has included validated replacement storage devices in items i and ii above to remain  
285 consistent with Section 3.6 below. Item vi has also been revised per stakeholder suggestions to add  
286 clarity on drawer rounding guidance when multiple Optimal Configurations are combined. EPA welcomes  
287 feedback on these changes.

- 288 8) Capacity Optimization Family Restriction: A product family may not be based solely on  
289 Capacity Optimizations. Every storage device submitted for qualification under Capacity  
290 Optimization must also include one or more transaction optimized configuration(s) and/or  
291 streaming optimized configuration(s) using the same storage device. A Capacity  
292 Optimization may only be submitted as an addition to one (or more) of the other  
293 optimizations.

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**Note:** EPA has added a requirement that for each storage device that is qualified under a Capacity Optimization, a corresponding transaction and/or streaming optimization configuration must be submitted for that storage device. As stated in Draft 3, a Capacity Optimization may only be submitted as an addition to one (or more) other optimizations.

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J. Other Definitions:

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1) Centralized Controller Storage: A storage product comprised of a storage controller which has a full view of all the storage devices in the storage product. Addition of one or more redundant storage controllers to a system which shares the same full system view also meets this definition.

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2) Distributed Controller Storage: A storage product comprised of two or more discreet storage controllers, each of which have a partial view to a partition of the overall system's storage devices, combined with an overall integration or aggregation function resulting in a single storage product view of attached servers. Each of these discrete storage controllers may, or may not, be deployed with some level of redundancy.

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**Note:** EPA has replaced the definitions for scale-up and scale-out storage products with the above definitions to provide a more clear differentiation between the two dominant system architectures in the current storage product market. EPA welcomes stakeholder feedback on these new definitions.

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3) Field-replaceable Unit (FRU): A unit, or component of a system that is designed to be replaced "in the field;" i.e., without returning the system to a factory or repair depot. Field replaceable units may either be customer-replaceable, or their replacement may require trained service personnel.

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4) High-availability (HA): The ability of a system to perform its function continuously (without interruption) for a significantly longer period of time than the reliabilities of its individual components would suggest. High availability is most often achieved through failure tolerance.

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**Note:** EPA has removed the Maximum Sustainable Performance definition as it is not used in the most recent drafts of the V1.0 Data Center Storage specification or test method.

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5) Maximum Time to First Data (MaxTTFD): The maximum time required to start receiving data from a storage product to satisfy a read request for arbitrary data.

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6) RAS Features: An acronym for reliability, availability, and serviceability features. RAS is sometimes also expanded to RASM, which adds "Manageability" criteria. The three primary components of RAS as related to storage products are defined as follows:

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i) Reliability Features: Features supporting a storage product's ability to perform its intended function without interruption due to component failures. Technologies applied to increase reliability include: component selection (MTBF), redundancy (both at a micro and macro levels), temperature and/or voltage de-rating, error detection and correction technologies.

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ii) Availability Features: Features that support a storage product's ability to maximize normal operating time and minimize planned and unplanned down time.

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iii) Serviceability Features: Features that support a storage product's ability to be serviced (e.g., hot-plugging).

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iv) Parity RAID: A collective term used in this specification to refer to any RAID system that achieves better efficiency than RAID 1 (i.e., mirroring).



- 336 v) Non-disruptive Serviceability: Support for continued availability of data and response  
337 times during all FRU and service operations; including break/fix, code patches,  
338 software/firmware upgrades, configuration changes, data migrations, and system  
339 expansion.
- 340 7) Physical Data: Data generated by testing a storage product using the ENERGY STAR Test  
341 Method for Data Center Storage.
- 342 8) Modeled Data: Data generated from an algorithmic tool, designed either by the ENERGY  
343 STAR Partner or a third party, which generates estimated test results (e.g., power,  
344 performance) for a set of storage product configuration inputs.
- 345 9) Read/Write:
- 346 i) Random Read: Any I/O load in which consecutively issued read requests do not specify  
347 adjacently addressed data. The term random I/O is commonly used to denote any I/O  
348 load that is not sequential, whether or not the distribution of data locations is indeed  
349 random.
- 350 ii) Random Write: Any I/O load whose consecutively issued write requests do not specify  
351 adjacently addressed data. The term random I/O is commonly used to denote any I/O  
352 load that is not sequential, whether or not the distribution of data locations is indeed  
353 random.
- 354 iii) Sequential Read: An I/O load consisting of consecutively issued read requests to  
355 adjacently addressed data.
- 356 iv) Sequential Write: An I/O load consisting of consecutively issued write requests to  
357 adjacently addressed data.
- 358 10) Response Time: The time required for the UUT to complete an I/O request.
- 359 11) Unit Under Test (UUT): The storage product being tested.

## 360 2 QUALIFYING PRODUCTS

### 361 2.1 Included Products

- 362 2.1.1 Products that meet all of the following conditions are eligible for ENERGY STAR qualification,  
363 with the exception of products listed in Section 2.2:
- 364 i. meet the definition of a Storage Product provided in Section 1 of this document;
- 365 ii. do not fall within the exceptions identified in Section 2.2 of this document;
- 366 iii. are comprised of one or more SKUs and be able to be purchased in a single order from a  
367 storage product vendor;
- 368 iv. are characterized within the Online 2, 3, or 4 Storage Taxonomy categories<sup>2</sup> with the  
369 following additional criteria;
- 370 a) contain a controller with advanced data recovery capability such as RAID, mirroring/ grid  
371 technology, or other comparable advanced error detection and recovery systems;
- 372 b) support Block I/O storage functions either entirely or as an additional capability, with the  
373 exception of object based storage; and
- 374 c) implement centralized or distributed controller storage.

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<sup>2</sup> As defined in the "SNIA Emerald™ Power Efficiency Measurement Specification," Version 2.0, Rev 1 (6 October 2013).

375 **Note:** Based on stakeholder feedback from Draft 3, EPA has clarified that all products submitted for  
376 qualification must include a controller with advanced data recovery capability, including but not limited to  
377 RAID. The RAID only requirement in Draft 3 was too restrictive given newer storage architectures.

378 Additionally, scale up storage has been renamed centralized controller storage, and scale-out storage has  
379 been renamed distributed controller storage. Both architecture types are included in the scope of this  
380 Version 1.0.

## 381 **2.2 Excluded Products**

382 2.2.1 Products that are covered under other ENERGY STAR product specifications are not eligible  
383 for qualification under the ENERGY STAR Data Center Storage specification. The full list of  
384 specifications currently in effect can be found at [www.energystar.gov/specifications](http://www.energystar.gov/specifications).

385 2.2.2 The following products are specifically excluded from qualification under this specification:

- 386 i. Personal / Portable Data Storage Products;
- 387 ii. Computer Servers;
- 388 iii. Blade Storage Products;
- 389 iv. Direct Attached Storage Products
- 390 v. Network Attached Storage Products that cannot perform block I/O;
- 391 vi. Object Storage Products;
- 392 vii. Storage devices in the following categories of the taxonomy: Near-online, Removable Media  
393 Library, Virtual Media Library, Adjunct Storage Products, and Interconnect Elements;
- 394 viii. Online storage devices without an included RAID controller, e.g. a collection of disks which  
395 rely on a PCI add-in card in a server for RAID functions (JBODs);

## 396 **3 QUALIFICATION CRITERIA**

### 397 **3.1 Significant Digits and Rounding**

398 3.1.1 All calculations shall be carried out with directly measured (unrounded) values.

399 3.1.2 Unless otherwise specified, compliance with specification limits shall be evaluated using  
400 directly measured or calculated values without any benefit from rounding.

401 3.1.3 Directly measured or calculated values that are submitted for reporting on the ENERGY STAR  
402 website shall be rounded to the nearest significant digit as expressed in the corresponding  
403 specification limit.

### 404 **3.2 Power Supply Requirements**

405 3.2.1 Power Supply Units (PSUs): PSUs used in storage products eligible under this specification shall  
406 meet the following requirements when tested using the *EPRI Generalized Internal Power Supply*  
407 *Efficiency Test Protocol, Rev. 6.6* (available at [www.efficientpowersupplies.org](http://www.efficientpowersupplies.org)).

- 408 i. Efficiency: A storage product PSU shall meet efficiency requirements as specified in Table 1.

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**Table 1: Efficiency Requirements for PSUs**

PSU Type	Rated Output Power	20% Load	50% Load	100% Load
Non-Redundant Capable PSU	All Output Levels	85%	88%	85%
Redundant Capable PSU	All Output Levels	85%	89%	85%

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- ii. Power Factor: A storage product PSU shall meet power factor requirements as specified in Table 2.

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**Table 2: Power Factor Requirements for PSUs**

PSU Type	Rated Output Power	20% Load	50% Load	100% Load
Non-Redundant Capable PSU	All Output Levels	0.80	0.90	0.95
Redundant Capable PSU	≤ 500 watts	0.80	0.90	0.95
	500 watts < Output ≤ 1000 watts	0.80	0.90	0.95
	> 1000 Watts	0.80	0.90	0.95

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- iii. Efficiency and Power Factor in Embedded Equipment: Embedded PSUs that power primary components of the storage product, including controllers and drawers, must meet the requirements in Table 1 and Table 2. Embedded PSUs that do not power primary components of the storage product are not subject to PSU requirements.

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**Note:** EPA is proposing to remove the 10% load PSU requirements in Table 1 and Table 2. Based on discussions with stakeholders, EPA’s review of available data has shown that storage products do not typically operate at those low load points and their PSUs are often not tested at a 10% load point, creating additional test burden if it were to be required. Additionally, EPA surveyed 80 PLUS Silver level data and determined that the vast majority of power supply products that meet the 20%, 50%, and 100% load requirements also meet the 10% requirements, so energy savings should be realized in those few cases where a product operates near 10% PSU load. EPA will provide the option of reporting performance at 10% load at the time of qualification.

### 3.3 Power Modeling Requirements

- 3.3.1 Power Modeling Presale tool: For Online 4 systems that qualify using modeled data, EPA expects that a power modeling tool characterizing the storage product will be made available to manufacturer qualified purchasers of the product. The power modeling tool must provide an estimated power usage of a deployed configuration based on user-selected configuration characteristics. Online 4 systems that are qualified using modeled data are expected to make performance/watt data available to manufacturer qualified purchasers of the product.

**Note:** EPA has clarified that for manufacturers of Online 4 systems that submit modeled data for qualification purposes, EPA expects that manufacturers will make performance/watt data available to qualified purchasers of their products.

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437 **3.4 Energy Efficiency Feature Requirements**

438 3.4.1 To qualify for ENERGY STAR, a storage product must contain the following features,  
439 implemented as specified:

440 i. *Parity RAID*: A storage product must offer a form of Parity RAID, mirroring/ grid technology, or  
441 other comparable advanced error detection and recovery systems.

442 **Note:** EPA has revised the Parity RAID requirement to include alternative Grid architectures that  
443 implement advanced error detection and recovery systems which are unlike traditional Parity RAID  
444 solutions. EPA welcomes stakeholder feedback on this addition.

445 ii. *Adaptive Active Cooling*: A storage product must utilize adaptive cooling technologies that  
446 reduce the energy consumed by the cooling technology in proportion to ambient air  
447 temperature conditions in proximity to the storage product and the current cooling needs to  
448 the storage product. (e.g., reduction of variable speed fan or blower speeds at lower ambient  
449 air temperature). This requirement is not applicable to devices that employ passive cooling.

450 **Note:** EPA has added clarification that devices within a storage product that use only passive cooling are  
451 not required to meet the adaptive cooling requirements in Section 3.4.

452 3.4.2 A storage product shall make available for purchase to the end user configurable / selectable  
453 features listed in Table 3 in quantities greater than or equal to those listed in Table 4.  
454

455 **Table 3: Recognized COM Features**

Feature	Verification Requirement
COM: Thin Provisioning	SNIA verification test
COM: Data Deduplication	SNIA verification test
COM: Compression	SNIA verification test
COM: Delta Snapshots	SNIA verification test <sup>3</sup>

<sup>3</sup> SNIA defined verification techniques for the COMs listed in Table 3 can be found in the “SNIA Emerald™ Power Efficiency Measurement Specification” Version 1.0 released 23 August 2011. Further detail may be found at [www.snia.org/green](http://www.snia.org/green).

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**Table 4: COM Requirements for Online 2, 3, and 4 Systems**

Storage Product Category	Minimum number of COMs required to be made available
Online 2	0
Online 3	1
Online 4	1

458 **Note:** Based on stakeholder feedback from Draft 3 and EPA’s own analysis, EPA has revised the number  
 459 of COMs that are required to be available for the Online 3 and Online 4 categories. Stakeholders have  
 460 provided examples of older storage products in the market that cannot offer multiple COM features, but  
 461 can still produce competitive performance/watt results overall. EPA welcomes stakeholder feedback on  
 462 the proposed levels set in Table 4.

463 **3.5 Information Reporting Requirements**

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465 3.5.1 Active and Idle State Efficiency Disclosure: To qualify for ENERGY STAR, all active and idle  
 466 state test results shall be reported

- 467 i. Test results shall be provided in the Power and Performance Data Sheet (PPDS) as defined  
 468 in Table 5.

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470 **Table 5: Active and Idle State Efficiency Test Results Displayed in the ENERGY STAR PPDS**

Workload Test	Transaction Optimization	Streaming Optimization	Capacity Optimization
Hot Band	Required	Optional	Optional
Random Read	Required	Optional	Optional
Random Write	Required	Optional	Optional
Sequential Read	Optional	Required	Optional
Sequential Write	Optional	Required	Optional
Ready Idle	Required	Required	Required

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472 **Note:** EPA is adopting the Version 2.0 SNIA Emerald™ Power Efficiency Measurement Specification in  
 473 the Version 1.0 Data Center Storage test method. In the Version 2.0 Emerald™ specification, mixed  
 474 workloads in Table 5 have been replaced with the “Hot Band” workload which more accurately addresses  
 475 systems with caching ability. Additional details on the Hot Band workload can be found in the Version 2.0  
 476 Emerald™ specification: [http://www.snia.org/sites/default/files/EmeraldMeasurementV2\\_0\\_1.pdf](http://www.snia.org/sites/default/files/EmeraldMeasurementV2_0_1.pdf).

477 EPA maintains its proposal of evaluating storage products using a predetermined Active and Idle State  
 478 testing methodology, with results to be reported via the ENERGY STAR program as part of the PPDS.

3.5.2 The weighted percentages shown in Table 6 shall be used to calculate the appropriate Optimal Configuration point for a given storage product.

**Table 6: Workload Weighting Requirements**

Workload Test	Transaction Optimization	Streaming Optimization	Capacity Optimization
Hot Band	100%	0%	0%
Sequential Read	0%	70%	0%
Sequential Write	0%	30%	0%
Ready Idle	0%	0%	100%

**Note:** Table 6 has been revised to include the new Hot band workload designed to measure transaction systems which incorporate caching. Transaction systems that do not use caching are also assessed accurately by this workload.

The above table includes a revised percentage weighting of four workloads with the intent that they will provide a reasonable representation of each Optimization category. The EPA welcomes feedback on the revised allocation of workloads, both in terms of weighting and workload inclusion. Based on discussions with stakeholders, the above numbers are believed to be reasonable assumptions for workload weightings.

3.5.3 Testing Data Requirements for Online 2 and Online 3 Centralized Controller Storage Products: The following testing data is required for each configuration reported for qualification as ENERGY STAR:

- i. Physical data for all 6 measurements listed in Table 5 shall be submitted for all of the following system sizes:
  - (a) Manufacturer determined Optimal Configuration point;
  - (b) One additional data submission per storage product of a Transaction Optimized Configuration and / or Sequential Optimized Configuration (as appropriate) at a manufacturer chosen point at least 40% smaller in storage device count compared to the optimal configuration, rounded down to the nearest drawer boundary or partial drawer if one drawer; and
  - (c) One additional data submission per storage product of a Transaction Optimized Configuration and / or Sequential Optimized Configuration (as appropriate) at a manufacturer chosen point at least 15% larger in storage device count compared to the Optimal Configuration, rounded up to the nearest drawer boundary;
  - (d) Configurations selected for additional data points (b) and (c) shall utilize storage devices representative of the highest deployed volume by the manufacture for the respective workload.
  - (e) Additional data points (b) and (c) are not required if the manufacturer has not submitted an Optimal Configuration point for the given workload.
  - (f) Additional data points (b) and (c) are not required if the storage product is not marketed with storage device quantity configurability.
  - (g) Configurations consisting *exclusively* of SSD storage devices are not required to submit physical test point results. Note this exclusion does **not** apply to Optimal Configurations consisting of mixed storage devices where one of the devices is an SSD.

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- ii. Modeled data for all 6 measurements listed in Table 5 may optionally be submitted for all system sizes listed above, as well as any other system sizes the manufacturer wishes to provide.
  - iii. Verification testing of COM features (table 3) specified by the storage product shall be executed at least once using storage devices of the vender's choice. Once verified there is no requirement to re-execute the verification testing procedure with different storage devices.
- 526 3.5.4 Testing Data Requirements for Online 4 Centralized Controller Storage Products: The  
527 following testing data is required for each configuration submitted for qualification as ENERGY  
528 STAR:
- i. Physical data for all 6 measurements listed in Table 5 shall be submitted for the following system size:
    - 531 (a) Manufacturer determined Optimal Configuration point.
    - 532 (b) Configurations consisting *exclusively* of SSD storage devices are not required to
    - 533 submit physical test point results. Note this exclusion does **not** apply to Optimal
    - 534 Configurations consisting of mixed storage devices where one of the devices is an
    - 535 SSD.
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  - 537 ii. Verification testing of COM features (table 3) specified by the storage product shall be
  - 538 executed at least once using storage devices of the vender's choice. Once verified there is
  - 539 no requirement to re-execute the verification testing procedure with different storage devices.
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  - 541 iii. Modeled data for all 6 measurements listed in Table 5 shall be submitted for all of the
  - 542 following system sizes;
    - 543 (a) Manufacturer determined Optimal Configuration point;
    - 544 (b) At least 6 manufacturer chosen points smaller in storage device count compared to
    - 545 the Optimal Configuration, with the smallest point being at least 40% smaller in
    - 546 storage device count; and
    - 547 (c) At least 6 manufacturer chosen points larger in storage device count compared to the
    - 548 optimal configuration, with the largest point being at least 15% larger in storage
    - 549 device count.
    - 550 (d) Additional data points (b) and (c) are not required if the storage product is not
    - 551 marketed with storage device quantity configurability.
  - 552
  - 553 iv. Additional modeled data for all 6 measurements listed in Table 5 may optionally be submitted
  - 554 for other system sizes that the manufacturer wishes to provide.
  - 555
  - 556 v. If accurate modeled data for an Online 4 storage product submission cannot be provided,
  - 557 manufacturers may use the full testing requirements for Online 2 and Online 3 in lieu of the
  - 558 Online 4 testing requirements.
- 559 3.5.5 Testing Data Requirements for all Distributed Controller Storage Products: The following test  
560 data is required for each configuration submitted for qualification as ENERGY STAR:
- 561 i. All testing and data requirements of Sections 3.5.3 and 3.5.4 shall be followed.
  - ii. When testing, the smallest marketed quantity of storage controllers or nodes shall be tested.
  - iii. Additional systems with a larger quantity of storage controllers may be optionally submitted.

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**Note:** EPA has proposed specific testing requirements for distributed controller storage. These products shall follow the same testing procedures as centralized controller storage products, testing the configuration with the smallest marketed quantity of storage controllers available. EPA is aware of distributed controller storage products which have a fixed number of storage devices per node. These systems shall make all measurements with the fixed number of storage devices allowed in the storage product. EPA welcomes stakeholder feedback on this proposal.

3.5.6 Data for a standardized PPDS shall be submitted for each ENERGY STAR qualified storage product or storage product family.

- i. Partners are encouraged to provide one set of data for each ENERGY STAR qualified product configuration, though provision of a data set for each qualified product family is also acceptable.
- ii. Whenever possible, Partners must also provide a hyperlink to a more detailed power calculator on their website that purchasers can use to understand power and performance data for specific configurations within the product family.

3.5.7 Information presented in the PPDS will be located on the ENERGY STAR website once the specification is finalized. The PPDS contains the following information:

- i. Product model name, model number, and SKU or other configuration identification number;
- ii. A list of important product characteristics, including;
  - (a) System configuration;
  - (b) Storage controller details;
  - (c) Software configuration;
  - (d) Storage controller power supply information;
  - (e) Storage device drawer power supply information;
  - (f) Storage devices used per optimization points
  - (g) Input power and environmental characteristics during testing;
  - (h) System power optimization capabilities;
  - (i) Inlet air temperature and power consumption reporting capabilities.

**Note:** EPA has replaced storage media with storage devices for consistency with the definitions section above.

- iii. A list of qualified system configurations, including maximum, minimum and optimal configurations of qualified product families;
- iv. Data from required active and idle state test reporting;

**Note:** EPA has clarified that active and idle test results that are required to be published in Table 5 above will be published in the PPDS.

- v. Power consumption and performance data, along with guaranteed accuracy levels for all power and temperature measurements, disclosure of the time period used for data averaging, and a hyperlink to a detailed power calculator, as available;



- 599 vi. A list of power management and other power saving features available and enabled by  
600 default;
- 601 vii. Information on product power measurement and reporting capabilities;
- 602 viii. A list of selected data from the ASHRAE Thermal Report; and
- 603 ix. For product families, a list of qualified storage products within the family.

### 604 **3.6 Storage Device Replacement Requirements**

605 3.6.1 Replacement Storage Devices in As-Shipped Configurations: In order to reduce testing  
606 burden, manufacturers may replace storage devices that were used during qualification with  
607 storage devices that have similar energy efficiency performance/watt compared to the device  
608 being replaced after qualification. Storage product manufacturers must submit specification  
609 sheets from the storage device vendors for the original and replacement devices to validate  
610 the following:

- 611 i. No change in **any** of the following categories:
- 612 (a) Form factor
- 613 (b) Interface type, quantity, and transfer speed
- 614 ii. No reduction in the following features:
- 615 (a) Data Capabilities (e.g. Self-encryption)
- 616 (b) Power Management-related features and capabilities (e.g. Power Down Modes)
- 617 iii. Reported values within  $\pm 5\%$  for **all** of the following categories:
- 618 (a) Average Seek Time
- 619 (b) Sustained Transfer Rate
- 620 (c) Average Latency
- 621 (d) Reported average power consumption in like modes of operation
- 622 (e) Rotational Speed
- 623 (i) Not applicable to Non-Rotational storage devices
- 624 (ii) If the storage device is capable of multiple spindle speeds, the discreet speeds  
625 must be within 5%, and the criteria for entering each of those speeds must be the  
626 same.
- 627 ii) Equal or greater reported values for the following categories:
- 628 (a) Capacity
- 629 (b) Cache Size

630 3.6.2 Performance Improvement Cap: Replacement of a storage device in a storage product that  
631 leads to a change of greater than 20% of the overall system performance (performance/watt)  
632 as defined by Table 6 (with the exception of the Ready Idle metric) will require testing of a new  
633 Optimal Configuration for inclusion in the product family definition.

634 **Note:** EPA has simplified Section 3.6 based on stakeholder feedback on Draft 3. The resulting single list  
635 of requirements is applicable to both rotational and non-rotational storage devices unless otherwise  
636 noted. EPA has revised the requirements for the following categories which were previously located in the  
637 “no allowable changes” Section 3.6.1.i:

638 - Power Management-related features: EPA has clarified that these features cannot be removed in  
639 replacement devices, but additional functionality can be introduced in replacement devices.

640 - Rotational Speed: EPA received stakeholder feedback that tolerance should be provided for minor  
641 differences in device speed between different vendors and that multiple speed devices should be  
642 supported. The rotational speed requirement is not applicable to non-rotational storage devices.

643 - Cache Size: EPA received stakeholder feedback that newer storage devices may contain additional  
644 cache and should not be disqualified from the drive substitution provision.

### 645 3.7 Standard Performance Data Measurement and Output Requirements

646 **Note:** EPA continue to strive for harmonization between the ENERGY STAR Computer Server and  
647 Storage specifications and has updated this section to align with the Servers Final Draft Version 2.0  
648 currently out for stakeholder comment. Changes compared to the previous Draft 3 are noted below.

649 3.7.1 Data Elements: Online 3 and Online 4 storage products shall be capable of measuring and  
650 reporting the following data elements:

- 651 i. Input Power, in watts. Input power measurements must be reported with accuracy of less  
652 than or equal to  $\pm 5\%$  of the actual value for measurements greater than 200 W, through  
653 the full range of operation. For measurements less than or equal to 200 W, the accuracy  
654 must be less than or equal to 10 W times the number of installed PSUs; and
- 655 ii. Inlet Air Temperature (optional), in degrees Celsius, with accuracy of  $\pm 2^\circ\text{C}$ .

656 **Note:** Based on discussions with stakeholders, EPA is proposing to eliminate the standard performance  
657 data measurement and output requirements for Online 2 systems, as EPA has determined that the cost of  
658 supporting the required infrastructure is disproportionate to the cost of the storage product itself. As such,  
659 only Online 3 and Online 4 storage products will be required to meet the data elements requirements in  
660 3.7.1.

661 3.7.2 Reporting Implementation:

- 662 i. Data shall be made available in a published or user-accessible format that is readable by  
663 third-party, non-proprietary management systems;
- 664 ii. Data shall be made available to end users and third-party management systems over a  
665 standard network connection;
- 666 iii. Data shall be made available via embedded components or add-in devices that are  
667 packaged with the storage product (e.g., a service processor, embedded power or thermal  
668 meter or other out-of-band technology, iPDU, or pre-installed OS);
- 669 iv. When an open and universally available data collection and reporting standard becomes  
670 available, manufacturers should incorporate the universal standard into their products.

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674 3.7.3 Sampling Requirements:

- 675 i. *Input power:* Input power measurements must be sampled internally to the storage product  
676 at a rate of greater than or equal to measurement per contiguous 10 second period. A  
677 rolling average, encompassing a period of no more than 30 seconds, must be sampled  
678 internally to the storage product at a frequency of greater than or equal to once per ten  
679 seconds.
- 680 ii. *Inlet air temperature (optional):* Inlet air temperature measurements must be sampled  
681 internally to the storage product at a rate of greater than or equal to 1 measurement every  
682 10 seconds.
- 683 iii. *Timestamping:* Systems that implement time stamping of environmental data shall sample  
684 internally to the storage product data at a rate of greater than or equal to 1 measurement  
685 every 30 seconds.
- 686 iv. *Management Software:* All sampled measurements shall be made available to external  
687 management software either via an on-demand pull method, or via a coordinated push  
688 method. In either case the system's management software is responsible for establishing  
689 the data delivery time scale while the storage product is responsible to assuring data  
690 delivered meets the above sampling and currency requirements.

691 **Note:** EPA proposes that systems which incorporate timestamping of environmental data (power and  
692 temperature) shall be subject to proposed data reporting frequency requirements in Section 3.7.3.iii. The  
693 frequency of reporting measurement requirements i and ii have been revised to provide more clarity.  
694 Timestamped data can be assembled in time-order at a later date, providing increased flexibility for users  
695 of systems that offer this capability. In an effort to encourage timestamping capability, EPA has relaxed  
696 the reporting frequency requirements to encourage its use.

697 EPA has also added requirement iv to provide guidance on how the storage product is expected to  
698 interact with external management software to ensure that the data can be accessed by the end-user.

699 3.7.4 Documentation Requirements: The following information shall be included in the PPDS:

- 700 i. Guaranteed accuracy levels for power and temperature measurements, and
- 701 ii. The time period used for data averaging.

702 3.7.5 Section 3.7 may be satisfied in Version 1.0 using iPDU. In order to satisfy the Data Elements  
703 requirement, an iPDU must:

- 704 i. Meet all requirements for accuracy, sampling, and data reporting;
- 705 ii. Be made available for sale and delivery with qualified ENERGY STAR storage products.

706 **4 TESTING**

707 **4.1 Test Methods**

- 708 4.1.1 Test methods identified in Table 7 shall be used for purposes of evaluating active and idle  
709 state storage product energy efficiency.

710 **Table 7: Test Methods for ENERGY STAR Qualification**

Product Type	Test Method
All	ENERGY STAR Test Method for Data Center Storage Equipment, Rev. February 2013.

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**Note:** The reference in this table is revised to point to the ENERGY STAR Test Method. This document, a draft of which is distributed with this Draft 4 Specification, references the SNIA Emerald™ Power Efficiency Measurement Specification, Version 2.0 Rev 1 (6 October 2012).

714 **4.2 Number of Units Required for Testing**

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4.2.1 Representative Models shall be selected for testing per the following requirements:

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i. For qualification of an individual product model, a product configuration equivalent to that which is intended to be marketed and labeled as ENERGY STAR is considered the Representative Model;

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ii. For qualification of a product family one or more Optimization Configurations shall be tested and submitted. Within the range defined by the Maximum Qualified Configuration, Minimum Qualified Configuration, and Optimal Configuration, manufacturers continue to be held accountable for any efficiency claims made about their products, including those not tested or for which data was not reported;

724 **5 EFFECTIVE DATE**

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5.1.1 Effective Date: The Version 1.0 ENERGY STAR Data Center Storage specification shall take effect in **July 2013**. To qualify for ENERGY STAR, a product model shall meet the ENERGY STAR specification in effect on its date of manufacture. The date of manufacture is specific to each unit and is the date on which a unit is considered to be completely assembled.

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5.1.2 Future Specification Revisions: EPA reserves the right to change this specification should technological and/or market changes affect its usefulness to consumers, industry, or the environment. In keeping with current policy, revisions to the specification are arrived at through stakeholder discussions. In the event of a specification revision, please note that the ENERGY STAR qualification is not automatically granted for the life of a product model.

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**Note:** As a reminder, the Data Center Storage program would have a slightly delayed effective date to enable lab accreditation to the ENERGY STAR Test Method and Certification Bodies to prepare for the certification process. Therefore, EPA will choose an effective date approximately 3 months following finalization.

738 **6 CONSIDERATIONS FOR FUTURE REVISIONS**

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**Note:** This section will be updated in further drafts to capture issues that, while excluded from the Version 1.0 specification, may be reevaluated in future versions.

741 TBD