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Sub: Proposed Scheme for *Energy Consumption Rating and Energy Passport for Telecommunications Products, Equipment and Network/Services*

Respected Sir,

Greetings from MAIT!

MAIT, on behalf of its members, would like to thank TEC and the Fixed Access (FA) Division of TEC for sharing the document on *Energy Consumption Rating and Energy Passport for Telecommunications Products, Equipment and Network/Services (No: TS-ECR001:2020)* and allowing us to submit our feedback on the same.

We would like to bring to your kind attention that the Ministry of Power in 2001 enacted the *Energy Conservation Act (EC Act)* with a goal of reducing energy intensity of Indian economy. Subsequently, on March 1, 2002 the Bureau of Energy Efficiency (BEE), a statutory body under Ministry of Power responsible for spearheading the improvement of energy efficiency in the economy through various regulatory and promotional instruments, was constituted at the central level to facilitate the implementation of the EC Act. Further, as per *section 14 of the EC Act 2001*, Central Government in consultation with the BEE may develop *standards and labeling (S&L) program of equipment and appliances.* The Ministry of Power, through BEE, has initiated a number of energy efficiency initiatives in the areas of *standards and labelling of appliances.* One such energy efficiency initiatives of BEE to promote energy conservation and energy efficiency is the *"STAR LABEL" Program***.** The ***"Star Label"*** scheme is a flagship program of BEE and is one of the most effective policy tools for improving the energy efficiency of appliance/equipment and lowering energy costs to the consumer. Mandatory energy efficiency standards coupled with labels that describe energy performance enable the consumers to make informed choice for purchasing efficient products that save energy and reduce expenses. The scheme is invoked for 26 equipment/appliances, out of which 10 appliances are under mandatory domain and remaining 16 appliances are under voluntary domain.

Since the Energy Conservation Act, 2001 entrusts BEE with the responsibility to assist in developing policies and strategies with the primary objective of reducing energy intensity of the Indian economy, we strongly recommend that if the Indian Government/ Department of Telecom wishes to bring *Energy Consumption Rating* system for Telecom equipment, it should consult BEE / Ministry of Power. We strongly urge that any scheme related to the energy rating be developed and rolled out by BEE as they have the necessary experience and expertise in rolling out mass energy efficiency programs for several category of products in the country.

We recommend that TEC should consult BEE on developing any parallel energy rating/labelling scheme in the country.

With respect to the standards for energy efficiency, it is a well-known fact that BIS is the National Standard Body of India established with the prime objective of formulating standards for the country. BIS represents India in international standards bodies like International Organization for Standardization (ISO) and International Electrotechnical Commission (IEC), and participates actively in the international standardization work undertaken in these bodies. BIS presents the national viewpoint on various draft international standards during the process of development of these standards so that the country's interest is protected and reflected in these standards. This enables the BIS technical committees to consider adoption of the International Standards as Indian Standards without any modifications. There are around 1,000 technical committees within BIS carrying out standardization work in 14 broad technological areas [including Electronics, **Telecommunication** and Information Technology Division Council (LITD-0)]. As of March 2019, BIS has developed **20227 Indian Standards**. Keeping in view the existence and role of BIS, we strongly recommend that TEC/ DoT do not initiate any work on developing standards on *"Energy Consumption Rating (ECR)"* and *"Energy Passport Certification"* for telecom products, equipment and networks or services. Instead, if the DoT/TEC is of the view that there is a need to develop a standard to regulate the telecom products in the country, the work of developing the **standard should be carried out by BIS after DoT/TEC establish energy conservation potentia**l viz. the intensity or quantity of energy consumed; the amount of investment required for switching over to energy efficient equipment and availability of the energy efficient machinery and equipment required by the industry **[as mandated under *Section 14 (e) of the EC Act 2002*].**

While we understand the *National Digital Communications Policy*, *2018* emphasizes the importance of deployment of solar energy, green energy and renewable energy in the telecom and communication sector, the Policy does not encompass developing any energy consumption rating scheme for telecom equipment.

The impact of COVID-19 on the country and on the IT and Telecom industry needs no corroboration. The IT and Telecom industry is among one of the worst hit, both from the national and international impacts. This is leading to disruption of global scheme of things and has been rightfully declared as *Force Majeure* by Govt of India. Industry is facing unprecedented challenges in ensuring its survival under these stressful times and bringing the proposed draft standards on "Energy Consumption Rating and Energy Passport Certification" will cripple the entire IT and Telecom sector which is already debt-ridden, overburdened with regulatory and policy interventions from multiple government/sectoral compliances including various other testing requirements. Also, it is important to understand that bringing any new and India-specific regulations/standards on the already tumbling IT and Telecom Industry will only create unnecessary obstacles to international trade and have a deleterious impact on the ease of doing business in India.

As we know, India is a signatory to the WTO Agreement on TBT whereby, member countries are required to align their National Standards with International Standards. It is important to harmonize Indian Standards with International Standards formulated by International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC).

Additional Questions on the *Energy Consumption Rating and Energy Passport Scheme:*

1. When the Government of India has mandated BEE as the statutory body for EC ratings, why is TEC bringing a parallel Energy Passport rating scheme?
2. Has study been carried out to **establish energy conservation potentia**l in Telecom equipment viz., the intensity or quantity of energy consumed; the amount of

investment required for switching over to energy efficient equipment and availability of the energy efficient machinery and equipment ….. **[as mandated under *Section 14 (e) of the EC Act 2001*]** and the rationale established for bringing out an Energy consumption rating scheme for this category of products.

3. Even if BEE does not have an existing scheme for Telecom products, why does not TEC request BEE to come up with an energy rating scheme for telecom products. BEE is the body identified by the GOI. BEE already does EC ratings for IT products, and today technology is evolving where Telecom and IT products are converging in technology with overlap in products. Further, BEE is mandated to bring out electrical energy ratings for all category of products that consume energy.
4. Has BIS been consulted while drafting the standards? BIS is the body that has already developed energy efficiency standards for certain products which are completely aligned with IEC standards.

Further, today as India looks to attract electronic manufacturing into the country, it is very critical that India does not make it complex for technology companies to operate due to the overlap and duplicity of policy, certification and regulation, particularly in electronics where the Products overlap and are converging.

We are sure you will take an informed view for the good of the Nation and Industry. We wish to assure you that on behalf of our members who design and manufacture both IT, OA & Telecom products that we look forward to working with you in the progress of the nation.

With regards,

George Paul
Chief Executive Officer

CC: Shri Anshu Prakash, Secretary, Department of Telecommunications
CC: Ms Anita Praveen, Additional Secretary, Department of Telecommunications
CC: Dr. R. S. Sharma, Chairman, TRAI
CC: Shri Sunil K. Gupta, Secretary, TRAI
CC: Shri Abhay Bakre, Director General, Bureau of Energy Efficiency
CC: Shri Pramod Kumar Tiwari, Director General, Bureau of Indian Standards
CC: Smt. Deepa Tyagi, Sr. DDG, Telecommunication Engineering Centre
CC: Shri Alok Jaimal, DDG (FA), Telecommunication Engineering Centre

Attached: For your reference and due consideration, observations on Technical references in the draft document shared. This is a work in progress document from MAIT on an exhaustive draft document of high technical caliber published by TEC.

ANNEXURE

Technical Notes & Observations on the TEC document:

- We have noted that in the document shared by TEC, under the Table 6 [Server, Equipment category (Telecom Equipment) and Sub-category (Servers)], refers to ETSI EN 303 470 standard for Test Methodologies, Equipment Configuration and Set-Up, and General Measurement Conditions for servers. We recommend that TEC should refer to ISO/IEC 21836:2020 international standard, instead of EN 303 470 standard for Test Methodologies, Equipment Configuration and Set-Up, and General Measurement Conditions for servers. There remain significant differences between ETSI 3030 470 and ISO/IEC 21836 standard. This action will allow server equipment manufacturers to comply with requirements more quickly and efficiently. ISO/IEC 21836 is an international standard written for the purpose of standardizing all of the best practices for server energy efficiency test methodologies, equipment configuration and set-up, and general measurement conditions, and was developed and approved by 22 countries, and 11 observing nations, and in collaboration with The Green Grid (TGG), and SPEC.

- Similarly, for Modes, Weights, and Weight Coefficient outlined in the Table 6, the TEC standard should refer to ISO/IEC 21836:2020 international standard and the SPEC Server Efficiency Rating Tool (SERT) Design Document 2.0.2, to ensure consistency in the terminology and equations.

- Regarding Weighted (Energy Consumption Rating) ECR metric, TGG recommends aligning on server active state efficiency score as-is and not the inverse of active state efficiency score value. It's also not clear from the draft standard if there are specific ECR requirements for various server types in scope, to be used for ECR values in Energy Passport examples provided in Annexure-3. It's not clear if ECR calculations in Annexure-4, section 2.6 apply to servers. TGG has extensive server data analysis experience working with government agencies globally and looks forward to assisting TEC in determining the appropriate ECR requirements for servers.

- In Table 6 Remarks section outlining server product categories in scope, TGG recommends calling out number of installed processors instead of number of socket servers. There has been limited active efficiency data for servers greater than two instead installed processors. Since the Energy Consumption Rating (ECR) requirements appear to be not established, TGG recommends limiting the scope to servers with 1 and 2 installed processors and excluding direct current servers from scope.

- Work in Progress