



September 11, 2014

Anne Bailey
Director, ENERGY STAR Product Labeling
U.S. Environmental Protection Agency

By e-mail: mostefficient@energystar.gov

Re: ENERGY STAR Most Efficient 2015

Dear Ms. Bailey:

Samsung Electronics America, Inc. (“Samsung”), a winner of the ENERGY STAR Partner of the Year Award for Sustained Excellence in 2013 and 2014, is pleased to provide these comments on the proposed ENERGY STAR Most Efficient 2015 program requirements.

Samsung strongly supports the ENERGY STAR Most Efficient program. This program enables consumers to find the true top performers with respect to efficiency. With more than 1,000 ENERGY STAR certified product models, Samsung has almost doubled the number of its models that qualify as Most Efficient, increasing from 45 models in October, 2013, to 85 models in August, 2014, across multiple product categories.

As EPA considers the 2015 enhancements to the Most Efficient program criteria, Samsung urges EPA to consider two factors in particular:

1. The Most Efficient Clothes Washer category should reward only the products that achieve the highest level of efficiency. As a general matter, front-loading washers are more efficient than top-loading washers, although both types of washers provide identical functionality to consumers with respect to washing their clothes. ENERGY STAR currently maintains separate categories for front-loading and top-loading washers, and therefore allows some top-loading models to qualify for ENERGY STAR even though they are less efficient than some non-qualified front-loading models. Samsung believes the Most Efficient program should lead the way and set a higher standard than the regular ENERGY STAR program, and therefore, top-loading and front-loading washers should be combined into one Most Efficient category.

Samsung also proposes that EPA consider alignment of Most Efficient criteria for clothes washers with the recently proposed changes to the Consortium for Energy Efficiency (“CEE”) clothes washer specification—specifically, the new CEE Tier 3 criteria. (CEE

has a technology-neutral approach with one set of criteria for both front-loading and top-loading washers.) Alignment between CEE and ENERGY STAR Most Efficient at the CEE Tier 3 level will be essential to reduce confusion for many efficiency incentive programs around the nation.

2. Consumers must be able to trust that the ENERGY STAR brand signifies energy efficiency without compromising product performance. This is very important, because if manufacturers make products that achieve efficiency by compromising on performance—for example, by washing clothes or dishes less thoroughly—consumers will come to value the ENERGY STAR brand less and will turn away from the most efficient, energy-saving products. This is especially true for the Most Efficient program, which should identify the cream of the crop for consumers who want innovative products that they can feel comfortable using, while saving energy.

For this reason, Samsung supports EPA’s proposal to bring performance criteria into the Most Efficient program standards for dishwashers. Samsung also believes EPA should expand the use of performance measurement as a qualifying factor to other Most Efficient categories in the near future, including clothes washers.

Samsung looks forward to working with the EPA and stands ready to supply any information the EPA needs as it continues to enhance the Most Efficient program criteria.

Respectfully submitted,

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