



September 8, 2015

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

By e-mail: mostefficient@energystar.gov

Re: ENERGY STAR Most Efficient 2016

Dear Ms. Bailey:

Samsung Electronics America, Inc. (“Samsung”), a winner of the ENERGY STAR Partner of the Year Award for Sustained Excellence in 2013, 2014 and 2015, is pleased to provide these comments on the proposed ENERGY STAR Most Efficient 2016 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 700 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 84 models as of November 2014, across multiple product categories.

Samsung gladly supports and welcomes the 2016 enhancements to the Most Efficient program criteria and offers the following comments.

D) Clothes Washers: Samsung supports EPA’s decision to set the same requirements for top-load and front-load clothes washers in order to qualify for the Most Efficient recognition. This furthers the intent of the program to recognize and reward the products that achieve the highest level of efficiency. Samsung notes that EPA’s 2016 criteria would result in alignment of Most Efficient criteria for clothes washers with the Consortium for Energy Efficiency (“CEE”) clothes washer specification—specifically, the CEE Tier 2 criteria. Alignment between CEE and ENERGY STAR Most Efficient at the CEE Tier 2 level will be essential to reduce confusion for many efficiency incentive programs around the nation.

Samsung also proposes that ENERGY STAR criteria should be revised to reflect a similar approach by combining categories for front-load and top-load washers in future specifications on clothes washers. 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.



Because both types of washers serve the same function, they should be subject to the same requirements to prevent consumer confusion.

II) Dishwashers: Samsung supports EPA's decision to maintain 2015 criteria for 2016 and suggests that EPA review the requirements as more data becomes available given that ENERGY STAR requirements are changing at the beginning of 2016. Additionally, Samsung suggests that EPA review performance floor levels in future Most Efficient criteria based on the data reported by partners.

III) Refrigerator – Freezers: Samsung supports EPA maintaining the 2015 requirements for 2016 qualification. Moreover, Samsung suggests reviewing the requirements in 2017 as the ENERGY STAR product penetration increases.

IV) Most Efficient product Recognition: Samsung appreciates EPA's efforts in incentivizing Most Efficient products by working with efficiency program sponsors in the active promotion of Most Efficient logos as representing top-tier products. Through Most Efficient, consumers are able to identify innovative appliances that are the cream of the crop and save energy.

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,

John Godfrey
Senior Vice President, Public Policy
Samsung Electronics America, Inc.
1200 New Hampshire Ave., NW #650
Washington, DC 20036
john.godfrey@samsung.com
(202) 887-5667

Ravee Vaidhyanathan
Director, American Technology Office
Samsung Electronics America, Inc.
19 Chapin Rd., Bldg. D
Pine Brook, NJ 07058
ravee.v@samsung.com
(973) 808-6364