



August 22, 2019

Ann Bailey  
Director, ENERGY STAR Product Labeling  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington DC 20035

Sent by e-mail to [MostEfficient@energystar.gov](mailto:MostEfficient@energystar.gov)

**Re: Environmental Protection Agency (EPA) ENERGY STAR Most Efficient 2020 Criteria**

Dear Ms. Bailey:

Samsung Electronics (“Samsung”) respectfully submits these comments on the EPA’s proposed ENERGY STAR® Most Efficient 2020 Criteria.

A world leader in technology, Samsung is the leading home appliance brand in the United States ranked by sales. Committed to providing energy efficient products to U.S. consumers, Samsung received the 2019 ENERGY STAR Partner of the Year – Sustained Excellence Award for continued leadership and superior contributions to ENERGY STAR. This is the sixth Partner of the Year-Sustained Excellence Award presented to Samsung. Samsung also won the 2017 ENERGY STAR Emerging Technology Award for Innovative Refrigerant Systems.

Additionally, Samsung won the EPA Sustainable Materials Management program’s 2017 Cutting Edge Champion Award for our innovative Galaxy Upcycling program. EPA also honored the company’s U.S. e-waste collection efforts with the Gold Tier Award for the fifth consecutive year in 2018.

- I. **Clothes Washers:** Samsung supports EPA’s proposal to continue with minimum cleaning performance requirements for clothes washers in the proposed Most Efficient 2020 Criteria. Samsung encourages EPA to extend such minimum performance requirements to ENERGY STAR in addition to Most Efficient. Consumers must be able to trust that ENERGY STAR signifies energy efficiency without compromising product performance. This is very important because if the products are configured to achieve higher efficiency by compromising performance—for example, by cleaning clothes less thoroughly—consumers will come to value ENERGY STAR less and may turn away from energy-saving products. Alternatively, consumers may switch away from the tested default mode to a different mode that performs better, not recognizing the resulting increase in energy consumption. For these reasons, the mode of operation in which appliances are tested—generally, the default mode—should perform at or above a minimum level of acceptable functionality.
- II. **Dishwashers:** Given the energy efficiency benefits, water savings, and consumer amenity, Samsung requests that EPA require manufacturers to report regarding the

- availability of soil sensors for Most Efficient dishwashers. EPA should also extend this reporting to ENERGY STAR. Furthermore, Samsung suggests that EPA publish the availability of soil sensors in the Qualified Product List. Considering that the current penetration of dishwashers qualifying for ENERGY STAR is very high, consumers and utility companies would welcome a way to identify most energy efficient models. Gathering the above data will allow for future determination regarding the penetration of technologies such as soil sensors and enable EPA to revise ENERGY STAR and Most Efficient specifications in the future by taking into account technological development while helping consumers and utilities. Finally, beginning as soon as possible, Samsung proposes that EPA consider soil sensors as a requirement for qualification for ENERGY STAR and Most Efficient.
- III. **Dryers:** ENERGY STAR and Most Efficient are key drivers for utility incentives such as rebates. It is important that the latest energy efficiency innovations be recognized and rewarded. Thus, in the dryer category, Samsung believes EPA should require information from manufacturers about heat pump technology and include a field in the Qualified Product List for identification of such technology. Samsung also supports requiring information from manufacturers about the refrigerant used, if any, in order to disclose this information in the Qualified Product List.
- IV. **Refrigerators:** As demonstrated by the EPA Emerging Technology Award for Innovative Refrigerant Systems, innovations have occurred in using low Global Warming Potential (GWP) refrigerant in refrigerators. These low GWP refrigerants have significantly reduced impacts on the environment and resulted in improvements in energy efficiency.<sup>1</sup> Thus, Samsung recommends that EPA mandate reporting of refrigerant type and publish the information in the Qualified Product List to inform consumers about their options in the Most Efficient and ENERGY STAR categories.
- V. **Future Specifications:** For the reasons outlined above, we believe that EPA should continue to consider establishing minimum acceptable functionality levels using appropriate test procedures in future specifications for Most Efficient and ENERGY STAR qualification.

Samsung appreciates the opportunity to comment on EPA's proposed ENERGY STAR Most Efficient 2020 Criteria. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

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<sup>1</sup> See:

[https://www.energystar.gov/about/awards/energy\\_star\\_emerging\\_technology\\_award\\_consumers/low\\_global\\_warming\\_potential\\_gwp\\_refrigerant](https://www.energystar.gov/about/awards/energy_star_emerging_technology_award_consumers/low_global_warming_potential_gwp_refrigerant)