



LG Electronics U.S.A., Inc.

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Feb 28, 2020

Via E-Mail

Ms. Abigail Daken,
Manager
ENERGY STAR HVAC Program
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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Re: LG Electronics USA, Inc.'s Comment for ENERGY STAR Central Air Conditioner and Heat Pump Equipment Eligibility Criteria Draft 2 Version 6.0

Dear Ms. Abigail Daken:

Thank you for giving us the opportunity to comment on the ENERGY STAR Central Air Conditioner and Heat Pump Equipment Eligibility Criteria Draft 2 Version 6.0.

LG Electronics USA, Inc., based in Englewood Cliffs, N.J., is the North American subsidiary of LG Electronics, Inc., a \$55 billion global innovator in technology and manufacturing. In the United States, LG sells a wide range of innovative home appliances, home entertainment products, mobile phones, commercial displays, air conditioning systems, solar energy solutions and vehicle components. The "Life's Good" marketing theme encompasses how LG is dedicated to people's happiness by exceeding expectations today and tomorrow. LG is a 2019 ENERGY STAR® Partner of the Year-Sustained Excellence. www.LG.com.

Here at LG Electronics USA, we highly appreciate EPA's continuous efforts in creating and bringing value to businesses and consumers. The ENERGY STAR program has always been a high priority to our business here in the US and we are always open to discuss your concerns and questions.

The following are LG's comments on the ENERGY STAR Central Air Conditioner and Heat Pump Equipment Eligibility Criteria Draft 2 Version 6.0:

Suggest increasing the criteria for Percent of Heating Capacity at 5° F

LG supports that EPA proposed climate specific performance criteria; it helps ensure the heat pump delivers warm air when it is cold outside especially in cold climate regions, this will benefit the customer by providing comfort and increased satisfaction of the heat pump. The heat pump is getting popular to use in cold climate regions and we believe that 70% of heating capacity at 5°F criteria in climates is not efficient enough. Therefore, EPA should set the percentage higher for heating capacity in cold climate regions in

order to save the energy consumption. LG suggests that 90% of heating capacity is the appropriate threshold so that customer can have benefit to use the heat pump in very low cold temperature.

Thank you for considering LG's comments for ENERGY STAR Central Air Conditioner and Heat Pump Equipment Eligibility Criteria Draft 2 Version 6.0. We would be glad to further discuss this matter or provide further detail should you so request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'KS' followed by a stylized flourish.

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cc: Julia Hegarty, ICF (julia.hegarty@icf.com)