



February 16, 2017

Katharine Kaplan
Manager, ENERGY STAR Product Development and Program Administration
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Sent by e-mail to appliances@energystar.gov

Re: Environmental Protection Agency’s ENERGY STAR Clothes Washers Final Draft Version 8.0

Dear Ms. Kaplan:

Samsung Electronics America (“Samsung”) respectfully submits these comments on the EPA’s ENERGY STAR Clothes Washers Final Draft Version 8.0 (“Final Draft”) specification.

Samsung is a world leader in technology and is one of the fastest growing home appliance brands in the United States. Committed to providing energy efficient home appliances to U.S. consumers, Samsung is the winner of the ENERGY STAR Partner of the Year Award for Sustained Excellence in 2013, 2014, 2015 and 2016.

I. The Energy Policy Act requires that EPA and DOE “regularly update ENERGY STAR products criteria.”¹

Samsung appreciates that EPA issued the Version 8.0 specification for ENERGY STAR to qualify eligible clothes washers. It is essential that EPA update specifications regularly to assure consumers that ENERGY STAR represents top performing products. Samsung also appreciates EPA’s Version 8.0 timeline for top-load washers, which aligns with the timeline of the federal minimum standards revision (both of which have an effective date of Jan 1, 2018) as this will reduce the impact on manufacturers.

Section 131 of the Energy Policy Act amends the Energy Policy and Conservation Act, and requires, among other provisions, that “the Administrator of Environmental Protection Agency (EPA) and the Secretary of Department of Energy (DOE) work jointly to: promote ENERGY STAR compliant technologies as the preferred technologies in the marketplace for achieving energy efficiency and reducing pollution; enhance public awareness of the ENERGY STAR label; preserve the integrity of the ENERGY STAR label; *regularly update ENERGY STAR products criteria*; and solicit comments from interested parties prior to establishing or revising

¹ 42 USC 6294

an ENERGY STAR product category, specification, or criterion.”² (Emphasis added.) Notably, the Energy Policy Act requires regular update of the ENERGY STAR products criteria. EPA outlined the following in the 2009 Memorandum of Understanding between the DOE and EPA, which was designed to enhance and strengthen the trusted ENERGY STAR program: “For product categories with longer-lived product models (e.g. heating and cooling, home appliances), specifications will be reviewed for a possible revision at a minimum of every three years or once the market share for ENERGY STAR qualifying products reaches about 35%.”³ The EPA finalized Version 7.1 ENERGY STAR Clothes Washer Specification (“Version 7.1”) on May 20, 2015. Therefore, an updated specification that will take effect in 2018, like this specification would when it moves to the final step, is due and should proceed with no delay. It is laudable and appreciated that EPA is working to revise Version 7.1 on a timely basis.⁴

II. Samsung Believes that Testing Should Ensure That A Product Performs Its Basic Function During The Energy Test.

Samsung agrees and supports EPA and DOE’s intent in ensuring that performance is not compromised as energy and water efficiency increase. Accordingly, Samsung agrees that the performance assessment during the energy test is essential to protect and enhance products basic function, which is aligned with ENERGY STAR’s guiding principles. Furthermore, Samsung believes consumers must be able to trust that the ENERGY STAR brand 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 the ENERGY STAR brand less and will turn away from energy-saving products. This is especially important for those consumers who want innovative products that perform their basic function effectively while saving energy. In particular, the modes of operation in which appliances are tested—generally, the default mode—should perform at a minimum level of acceptable functionality, or else consumers may be dissatisfied with their products in the default mode. Samsung also believes EPA should expand the use of minimum acceptable functionality measurement as a qualifying factor in the near future, with a robust test method, which would deter product configurations from achieving efficiency by compromising on performance in the tested mode.

While Samsung is disappointed that the Final Draft requires only pilot use of the test method, we understand the EPA-DOE approach to have measures of repeatability and reproducibility on the test method established over time through the pilot. Samsung stands ready to offer support to the EPA and DOE in this effort.

² *Id.*

³ See *Enhanced Program Plan for ENERGY STAR Products*, December 2, 2009, Page 7

⁴ See *Response to Key Issues/Concerns on the Enhanced Program Plan for ENERGY STAR Products*, May 12, 2010: “The process outlined in the new MOU and the Enhanced Program Plan is intended to ensure that ENERGY STAR specifications across all eligible product categories are reviewed on a timely basis so that revisions can occur and be anticipated as appropriate.”

III. Samsung Appreciates The Development Of The DOE Cleaning Performance Test Procedure.

Samsung appreciates that DOE and EPA are developing a cleaning test procedure, which would enable performance assessment under energy test procedure conditions. As mentioned above, we believe it is essential to ensure that the product's basic function is protected while the energy and water efficiency are improved, which is aligned with ENERGY STAR Guiding Principles. Samsung will continue to work with the EPA in establishing the robustness of the test procedure and support test procedure improvements as necessary.

IV. Top-load (TL) and Front-load (FL) Clothes Washer Categories Should Be Combined.

Samsung opposes the EPA proposal in the Final Draft wherein EPA has strengthened the specification for FL washers only and left the TL washers at the current Version 7.0 levels. Samsung views TL and FL systems as providing same basic function and hence we believe the specification levels should be technology neutral. EPA's decision to strengthen ENERGY STAR requirements only for FL washers in the Final Draft further lowers the qualification requirements for TL washers compared to FL washers. For instance, as per the current Final Draft levels, front load systems have to be 34% more efficient on Integrated modified Energy Factor than TL systems (set at 2.76 on FL vs 2.06 on TL) and 34% more efficient on Integrated Water Factor than TL systems (set at 3.2 on FL vs 4.3 on TL). Having lower requirements for top-load washers in turn promotes lower efficiency products as consumers would see the ENERGY STAR logo as implying similar efficiency levels and will likely make their purchasing decisions based on the implied efficiency being the same. Additionally, the Final Draft will separate further CEE Tier-I levels from ENERGY STAR and will create additional confusion in product rebate offerings from efficiency program administrators.

As noted previously, Samsung supports combining the product classes for top-load and front-load clothes washers for ENERGY STAR. Samsung believes that both front-load and top-load washers perform the same basic function, which is washing clothes, and Samsung believes EPA's specifications should be technology neutral. In addition, the typical physical size (footprint) is virtually the same for top-load and front-load washers, so given the same functionality, it makes sense to combine the categories as has been done prior to 2015 clothes washer standards.

V. The Proposed Addition of Washer with Supplemental Wash System is Appropriate.

The EPA's proposed new definition of Residential Clothes Washer with Supplementary Wash System expands the potential configurations of ENERGY STAR clothes washers and supports innovation in a technology-neutral manner. Samsung supports the inclusion of the new definition, which has clear eligibility criteria.

In conclusion, Samsung appreciates the opportunity to comment on EPA's ENERGY STAR Clothes Washers Final Draft Version 8.0 specification. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

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