



Sent by e-mail to appliances@energystar.gov

February 10, 2023

Ms. Tanja Crk
Product Manager
ENERGY STAR Labeled Products
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC, 20004

Re: EPA ENERGY STAR Draft 1 Version 1.0 Residential Electric Cooking Products Specification

Dear Ms. Crk:

Samsung Electronics America, Inc. (“Samsung”) respectfully submits the following comments on the proposed ENERGY STAR Draft 1 Version 1.0 Residential Electric Cooking Products Specification.

Samsung is one of the leading home appliance brands in the U.S. and we are committed to providing energy efficient product options to U.S. consumers. Samsung has won the ENERGY STAR Partner of the Year Award for Sustained Excellence nine times, including in 2022, and in 2021 we won the ENERGY STAR Corporate Commitment Award – a rare and distinguished recognition. Samsung has also won several ENERGY STAR Emerging Technology Awards, including the 2021 Award for Induction Cooking Tops, 2020 Award for Advanced Adaptive Compressors, 2017 Award for Innovative Refrigerant Systems, and 2013 Award for Advanced Clothes Dryers.

ENERGY STAR Product Specification for Residential Electric Cooking Products

Samsung supports EPA’s goal of recognizing top performing residential electric cooking products under the ENERGY STAR program. Samsung also supports EPA’s approach of technology neutrality in setting up the qualification requirements, given that the test data represents a similar energy distribution across coil, radiant and induction products.

Certification Criteria

Samsung suggests EPA consider providing a necessary reporting margin in the certification levels to cover manufacturing and test procedure variability. Manufacturers generally use about a 3% allowance to account for such variability to ensure compliance issues when certifying

products. Therefore, Samsung recommends that EPA change the certification criteria from its current level at 190 kWh/year to 195 kWh/year to allow for this variability.

EPA's Guiding Principles

EPA's Guiding Principles ensure that the ENERGY STAR program promotes energy efficiency while also taking into account the economic impact on consumers and businesses. The program seeks to balance energy savings with affordability, making energy-efficient products accessible to a wider audience. Samsung asks EPA to also consider the upcoming IRA home rebates in evaluating payback period and cost-effectiveness, which is in line with the Guiding Principles. The IRA will provide greater access for low and moderate income consumers to efficient electric cooking appliances. By applying those rebates to ENERGY STAR cooking products, low income consumers can continue to see utility savings throughout the lifetime of the product. We urge EPA to finalize this specification before IRA home rebates go to consumers in late 2023, but also encourage EPA to give thoughtful consideration given the opportunity for consumers created by the IRA home rebates. For example, if EPA finalizes this specification by the end of Q3 2023, this should generally still be before rebates will be available by state energy offices to consumers.

Connected Product Criteria

Samsung suggests EPA include additional connected product criteria so products can be listed as connected as part of this specification. The following features offer significant consumer utility: Wi-Fi connectivity, energy usage reporting, notification of the heating element's status, remote oven preheating, monitoring cooking progress, and the ability to turn off the oven remotely. Connected criteria can provide valuable insights for EPA on future advancements in reducing energy usage, as well as potential integration with other ENERGY STAR specifications, such as Smart Home Energy Management Systems (SHEMS).

Heating Up Time

Samsung supports EPA's proposal to include a measure of time to boil as a reporting requirement given it is an important consumer utility toward cooking top performance. A cooking appliance with a faster boiling time can heat water or cook food faster, which can reduce the overall energy consumption compared to an appliance with a slower boil time.

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Samsung appreciates the opportunity to comment on EPA's proposed ENERGY STAR Draft 1 Version 1.0 Residential Electric Cooking Products Specification. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

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