



Sent by e-mail to appliances@energystar.gov

September 12, 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 Version 1.0 Residential Electric Cooking Products
Final Draft Specification**

Dear Ms. Crk:

Samsung Electronics America, Inc. (“Samsung”) respectfully submits the following comments on the proposed ENERGY STAR Version 1.0 Residential Electric Cooking Products Final Draft 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 ten times, including in 2023, 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 2021-2022 Award for Induction Cooking Tops, 2020 Award for Advanced Adaptive Compressors, 2017 Award for Innovative Refrigerant Systems, and 2013 Award for Advanced Clothes Dryers.

Certification Criteria

We appreciate the EPA for taking partners’ input on the certification criteria. Samsung supports the proposed Integrated Annual Energy Consumption (IAEC) standard of 195 kWh/yr. This level accommodates variations in sampling plans, aligns with DOE observations, and ensures accurate certification and verification. This higher benchmark also increases the number of units available to consumers eligible for the Inflation Reduction Act (IRA) rebates, thereby enabling more households to access energy-efficient electric cooking appliances.

Portable Cooktops

Samsung does not believe portable cooktops should be included in this specification. However, we agree portable cooking products offer substantial consumer utility and should be evaluated as a separate product class. Moreover, the EPA dataset does not evaluate portable products. For

those reasons we propose that EPA should not include portable products within the scope of Version 1.0.

Coil Products

Samsung proposes that coil products be excluded from the scope of the Version 1.0 specification. When establishing new or revised specifications, ENERGY STAR's guiding principles consider the amount of energy that may be saved through the application of different technologies. In the case of coil products, DOE's analysis shows no available efficiency improvement given that no technology options could be identified. In addition, the dataset is insufficient to make reasonable assessment of efficiency levels for coil products. Only two coil products were assessed, compared to 48 electric resistance, and 25 induction models. Coil make up only 2.6% of the dataset, when they represent 25.6% of the electric cooking market place.¹

EPA, in its Final Draft Comment Matrix referenced that "EPA typically only includes additional product classes if there is substantial consumer utility". DOE's analysis concluded that ease of cleaning smooth elements provides enhanced consumer utility over coil elements, further supporting that coil elements should be assessed separately. EPA should reconsider coil products as a separate product class when newer technology options are available to implement for improved efficiency levels or when additional testing data becomes available. Until then, Samsung requests that EPA remove coil elements from consideration for Version 1.0.

EPA's Specification Timeline

We appreciate the EPA for considering partners' input in advancing the specification development. The upcoming IRA home rebates align with EPA's commitment to energy efficiency and will help low-income consumers access efficient electric cooking appliances. We thank EPA for moving swiftly to release the final draft specifications before late 2023 when rebates may be offered by state energy offices.

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

Respectfully submitted,

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¹ Based on 2022 AHAM Shipment Data

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