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**Re: EPA's ENERGY STAR Clothes Washers Draft 2 Version 8.0**

Dear Ms. Fiffer:

Samsung Electronics ("Samsung") respectfully submits these comments on the EPA's ENERGY STAR Clothes Washers Draft 2 Version 8.0 ("Draft 2") 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. Cleaning Performance Reporting:**

As we previously noted, Samsung gladly notes that EPA has included performance reporting requirements in the draft at least on a voluntary basis at this time. 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.

We believe the voluntary reporting would help EPA understand the distribution of cleaning performance levels in the qualified products and could pave the basis for establishing minimum

acceptable cleaning functionality levels in the future specification as well as provide an understanding of the test procedure limitations.

For these reasons, Samsung supports EPA's proposal to bring performance reporting into the ENERGY STAR standards for clothes washers. Samsung also believes EPA should expand the use of minimum acceptable functionality measurement as a qualifying factor in the near future, subject to the development of a test procedure, which would deter product configurations from achieving efficiency by compromising on performance in the tested mode

## **II. Development of DOE Test Procedure**

Samsung again supports EPA working with DOE to continue to develop a test method to measure the cleaning and rinse performance of residential clothes washers in energy test cycle in relation to energy and water use. We encourage EPA to advance a mechanism by which cleaning and rinse performance can be measured in a repeatable and reproducible manner. Samsung welcomes the opportunity to help DOE and EPA in developing the test procedure and will work with the agencies to that end.

## **III. Top-load (TL) and Front-load (FL) Clothes Washer Categories**

Samsung opposes the EPA proposal in Draft 2 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 Draft 2 further lowers the qualification requirements for TL washers compared to FL washers. For instance, as per the current Draft 2 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, Draft 2 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.

Samsung appreciates the opportunity to comment on EPA's ENERGY STAR Clothes Washers Draft 2 Version 8.0 specification. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

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