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May 19, 2023

Maddie Koewler  
National Association of State Energy Officials (NASEO)  
1300 North 17<sup>th</sup> Street, Suite 1275  
Arlington, VA 22209

**Re: Implementation Options for Home Energy Performance-Based Whole-House Rebate Program and High-Efficiency Electric Home Rebate Program**

Dear Ms. Koewler:

Samsung Electronics America, Inc. (“Samsung”) respectfully submits the following comments on the Request for Information on the IRA home rebate programs.

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.

**Category 2: Program Elements**

**Key Aspects of Implementation**

- State energy offices should consider providing sufficient lead time for communities to digest details through thorough communications on income verification and various aspects of the IRA home rebate programs. Advance notice will provide disadvantaged and low-income communities more time to prepare and remove the risk of overwhelming burdened households at launch given the complexity of the programs. There is tremendous opportunity for state energy offices to communicate to residents such as through websites and active calendar updates for state specific availability (i.e. when will a specific state go live with rebates to consumers).
- Retailers may want to consider targeted advertisements for retail locations in low and moderate-income areas. Given that smartphone penetration is high across all income levels, utilizing websites and sharing tools such as benefit calculators would be helpful. Moreover, state energy offices can consider mailers for marketing and communications in a way that serves their goals.
- State energy offices should support community based organizations on staying updated on the latest information and communicating in a simple and accurate manner to the communities that will benefit from rebates.
- Some utility companies have payment assistance programs that may be leveraged for braiding of funds. For example, the NJ Utility Assistance Program via Board of Public Utilities, which is temporarily expanding its low-income energy assistance program and its energy debt forgiveness program to middle class households, is one such example. Moreover, utility marketplaces could be used for braiding of funds as well.

- Categorical eligibility is a critical aspect to reach certain covered households. There is opportunity to tap into participants of SNAP, LIHEAP, Weatherization Assistance Program and Medicaid for automatic prequalification and targeted education.
- Based on Samsung analysis, a more granular definition of Area Median Income (AMI) (i.e. zip code vs county level AMI) will be more beneficial to a larger number of households in any given region. States should use an AMI threshold that benefits the largest amount of households in their state.
- States should deploy the efficiency and electrification rebates for all eligible income levels under the law simultaneously. It is important to drive momentum behind the rebate programs and deploying to both low and moderate income communities will be key for awareness building and massive attention.

### **Importance of Advancing Consumer Education through ENERGY STAR**

- The EPA ENERGY STAR program has 90% brand awareness and exercises great influence over consumers. State energy offices should require ENERGY STAR for the HOMES rebate program and ENERGY STAR is already a requirement for HEEHRA if applicable. Electric cooking products present a great opportunity for low and moderate income communities to benefit and ENERGY STAR is currently developing the first specification for this category. State energy offices should work to ensure that only ENERGY STAR certified electric cooking products receive rebates from consumers.
- ENERGY STAR appliances present an opportunity under HOMES to achieve greater energy savings. For example, the BPI 2400 reference in the IRA HOMES program is important to note. This standard references RESNET HERS standards, which highlight appliances. State energy offices should include ENERGY STAR and/or Most Efficient appliances such as washers and refrigerators for HOMES rebates.

### **Critical Statutory Interpretation of HEEHRA**

- The Inflation Reduction Act clearly states that electric cooking products, heat pump dryers, and heat pump HVAC products, among others, are included in a “Qualified Electrification Project” and they must be ENERGY STAR if applicable. Samsung encourages state energy offices to follow the requirements of the law for a “Qualified Electrification Project” and states should include all of the different requirements of the law. This will provide consumers with greater choice about which products to use rebates for and follow legislative intent. States should interpret the IRA home rebate provisions as they are written and for HEEHRA, there is no opportunity for expansion or narrowing of what a “Qualified Electrification Project” is.
- Moreover, states should consider providing maximum rebates for eligible products to offer consumers choice about the purchases they wish to make.
- Samsung encourages states to allow consumers to qualify for a HEEHRA rebate under “first time purchase with respect to that appliance” when converting any non-ENERGY STAR cooking appliance (gas or electric) to any ENERGY STAR electric cooking appliance, once the ENERGY STAR specification is finalized. ENERGY STAR is a key indicator of energy efficiency.

### **Offering Choices for Energy Efficient Options for Consumers**

- State energy offices should not limit rebates to US manufactured goods as this would significantly limit consumer choice and would be counterproductive to the environmental goals of a successful rebate program. There is no statutory basis in the IRA home rebate

programs for Buy American restrictions, domestic content requirements, or reducing incentives for imported goods.

- Manufacturers are prepared to address demand increase as it occurs. Industry addressed a rapid increase in demand for home appliances during the COVID-19 pandemic and will continue to do so successfully.

Samsung authorizes NASEO to publish and distribute this response to the NASEO RFI on its website and through other means to the states and general public. We have included no confidential or proprietary information in our response.

Samsung appreciates the opportunity to comment on NASEO's RFI for IRA home rebates. We would gladly welcome the opportunity to discuss these matters further with NASEO and state energy offices.

Respectfully submitted,

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