SAMSUNG

March 13, 2020

Abigail Daken
ENERGY STAR for HVAC
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC 20035
Sent by e-mail to CAC-ASHP@energystar.gov

Re: Draft 2 Version 6 ENERGY STAR Central Air Conditioner and Heat Pump (CAC/HP) Specification

Dear Ms. Daken:

Samsung HVAC America LLC ("Samsung") respectfully submits these comments on the EPA's proposed ENERGY STAR® Draft 2 Version 6 Central Air Conditioner and Heat Pump (CAC/HP) Specification.

Committed to providing energy efficient products to U.S. consumers, Samsung Electronics America received the 2019 ENERGY STAR Partner of the Year – Sustained Excellence Award for continued leadership and superior contributions to ENERGY STAR. This is the sixth Partner of the Year-Sustained Excellence Award presented to Samsung. Samsung Electronics America also won the 2017 ENERGY STAR Emerging Technology Award for Innovative Refrigerant Systems.

Additionally, Samsung Electronics America has received the U.S. EPA's Sustainable Materials Management Gold Tier Champion Award for its leadership in e-waste collection and recycling every year since its inception in 2014. In 2019, Samsung was also recognized with the EPA's Green Power Leadership Award for Excellence in Green Power Use. Moreover, Samsung is an energy efficiency innovator as demonstrated by our energy efficient ductless mini-split and variable refrigerant flow HVAC (Heating, Ventilation and Air Conditioning) technologies.

Certification Climate Criteria

Samsung appreciates EPA's reasoning for varied climate criteria for heat pump technology. Samsung supports the heating efficiency levels, represented by HSPF2 levels, in the cold climate category because these reflect real-world conditions of most significant for this climate. However, in moderate and hot climates, heating run hours and heating efficiency (HSPF2) is less important than cooling efficiency (SEER2 and EER2). Thus, we recommend that EPA proceed only with the SEER2 and EER2 categories for the moderate and hot climate criteria since these are also more reflective of real-world conditions of most significant use for these climates.

Quality Installation Capabilities

Samsung appreciates EPA's consideration of quality installation capabilities. Samsung believes that a separate preprogrammed test mode for each functionality could be redundant and may increase product complexity. Thus, we recommend a single preprogrammed test mode that will accomplish all the required functionality tests. For example, a "Startup Functionality Check" could verify refrigerant charge, indoor blower, cooling and heating mode, and defrost functionality. If any parameters are outside the manufacturers' recommended limits, the system can have the capability of alarming and displaying relevant error codes. Moreover, we would also like to note that airflow and static measurement are not be applicable to ductless systems, hence the specification should take this into account.

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Samsung appreciates the opportunity to comment on EPA's proposed ENERGY STAR Draft 2 Version 6 Central Air Conditioner and Heat Pump (CAC/HP) Specification. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted

Chandra Gollapudi
Cg.gollapudi@hotmail.com