

DOCKETED

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Comment Received From: John Godfrey

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Comments of Samsung Electronics America, Inc.

Additional submitted attachment is included below.



June 12, 2015

Via E-mail

California Energy Commission
Docket Office, MS-4
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

docket@energy.ca.gov

Re: Docket No. 15-WATER-03 for the Water Appliance Rebate Program

Dear Commissioner McAllister:

Samsung Electronics (“Samsung”) is a world leader in technology and is one of the fastest growing home appliance brands in the United States. Samsung is the winner of the ENERGY STAR Partner of the Year Award for Sustained Excellence in 2013, 2014 and 2015. Samsung is committed to providing energy efficient home appliances to U.S. consumers.

Samsung appreciates this opportunity to comment on the proposed *Water Appliance Rebate Program* (Docket 15-WATER-03). Samsung recognizes the severe water problem in California following the lowest snowpack ever recorded in the state and with no end in sight to the multi-year drought. To respond to this situation, Governor Jerry Brown signed Executive Order B-29-15 on April 1, 2015, directing the first-ever statewide mandatory water reductions and also directing the California Energy Commission (CEC) to implement a statewide water appliance and fixture rebate program.

Samsung supports and agrees with Governor Brown’s Executive Order to implement a statewide appliance rebate program to provide monetary incentives for the replacement of less efficient home appliances. This new short-term statewide rebate program will help capture water savings as well as reductions in greenhouse gas emissions, which are thought to have contributed significantly to the current change in climate.

Samsung believes that to be most effective, the rebate program should be limited to ENERGY STAR appliances. ENERGY STAR appliances use less energy and less water than non-ENERGY STAR appliances and therefore are better suited to the mission of the rebate program to capture water savings and reduce greenhouse gas emissions. Samsung has a broad range of water-efficient ENERGY STAR appliances to meet consumers’ needs, including dishwashers and clothes washers.

Regarding the amount of the rebate, Samsung’s view is that the amount should be at least \$100 per unit in order to maximize the program’s impact on addressing California’s water shortage. Based on Samsung’s experience, this amount will increase the participation rate more effectively



than a lesser amount, and it would drive a more robust consumer behavioral change to replace older units and obtain the water savings for the state and to provide ongoing savings to consumers on their household water and energy costs. In addition, Samsung recommends that a higher rebate be offered for front-loading ENERGY STAR clothes washers than for top-loading ENERGY STAR clothes washers, as the efficiency standards for front-loading models are more stringent, and on average, they are more efficient.

Samsung appreciates the opportunity to comment on the proposed *Water Appliance Rebate Program*. Please contact either of the undersigned, and we would be glad to further discuss these matters with the Commission.

Respectfully submitted,

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