



January 11, 2024

New Jersey Board of Public Utilities
44 S Clinton Ave
Trenton, NJ 08625

Re: DOCKET NO. QO23100733, In the Matter of the Implementation of Federal Inflation Reduction Act HOMES (Home Efficiency Rebates) and HEEHR (Home Electrification and Appliance Rebates) Program

To Whom It May Concern:

Samsung Electronics America, Inc. (“Samsung”) respectfully submits the following comments on the state of New Jersey’s Request for Public Input on the Inflation Reduction Act (IRA) home rebate programs.

Headquartered in Ridgefield Park, New Jersey, Samsung Electronics America 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.

Samsung would like to serve as a resource to New Jersey as the state implements IRA home rebates. Samsung has committed to net zero carbon emissions (Scope 1 and 2) for our consumer-facing business by 2030 and by 2050 across global operations. Moreover, we are among the top ranked companies in the US Environmental Protection Agency’s Green Power Partnership 100% Green Powers Users list. Energy efficiency is a key part of our sustainability strategy and we aim to continue raising the bar higher in efficiency in key product categories.

We recognize that the New Jersey “2019 Energy Master Plan outlines key strategies to reach the Administration’s goal of 100 percent clean energy by 2050, and the Global Warming Response Act 80x50 Report recommends pathways to reducing New Jersey’s greenhouse gas emissions 80% by 2050.”¹ The Inflation Reduction Act home rebate programs can help drive the state toward success to achieve these goals. In support of New Jersey’s strategic plans on implementation, we would like to emphasize the points that we believe are relevant to the equities in our home state.

A. Strategic Planning

Key Aspects of Implementation

¹ See:

<https://nj.gov/governor/climateaction/#:~:text=Energy%20Master%20Plan%20%26%20Global%20Warming,gas%20emissions%2080%25%20by%202050.>

- We believe New Jersey 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.
- New Jersey 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.
- New Jersey 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. 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.

Importance of Advancing Consumer Education through ENERGY STAR

- The EPA ENERGY STAR program has 90% brand awareness and exercises great influence over consumers. **New Jersey should consider requiring ENERGY STAR appliances for the HOMES rebate program and ENERGY STAR is already a requirement for HEAR if applicable.** Electric cooking products present a great opportunity for low and moderate income communities to benefit and ENERGY STAR has developed the first specification for this category. **New Jersey should work to ensure that only ENERGY STAR certified electric cooking products receive rebates from consumers.** For example, how fast an induction cooking product can boil water – twice as fast – is very helpful for overly burdened households. Putting less stress on the home HVAC system is another critical aspect, which is important given New Jersey’s diverse weather conditions. Improved efficiency compared to non-induction are among the many benefits.

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- 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. New Jersey should include ENERGY STAR and/or Most Efficient appliances such as washers and refrigerators for HOMES rebates.
- Samsung wants to underscore the importance of EPA allowing all-in-one washer dryers to be ENERGY STAR certified as heat pump dryers. The HEAR rebate program requires ENERGY STAR products where applicable while allowing for heat pump dryer rebates. In order for the all-in-one washer dryers to receive these rebates and amplify energy efficiency benefits, they should be considered for ENERGY STAR certification so consumers of all economic means can benefit from this growing and sustainability-enhancing segment of the market. If and when all-in-one washer dryers are considered ENERGY STAR heat pump dryers, they should be provided rebates under the IRA home rebate programs by state energy offices.

Critical Statutory Interpretation of HEEHRA

- We ask New Jersey to support and implement our interpretation that the IRA 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 therefore, states should include all of the different requirements of the law and provide rebates for all allowed categories. This will provide consumers with greater choice about which products to use rebates for and follow legislative intent. This will also help manufacturers and retailers market more consistently to consumers. We believe states should interpret the IRA home rebate provisions as they are written and for HEAR, and in our view, there is no opportunity for expansion or narrowing of what a “Qualified Electrification Project” is.
- Moreover, we ask New Jersey to provide maximum rebates for eligible products to offer consumers choice about the purchases they wish to make.

Benefits of Assessing Time, Location and Greenhouse Emissions

- States are allowed to address location, time and greenhouse emissions in their plans to DOE. We wanted to ensure New Jersey is aware of the ENERGY STAR Smart Home Energy Management System (SHEMS) as a way to increase energy savings from participating homes under the measured approach because such systems add thermostat and other device controls that can create operational and behavioral savings, along with savings from equipment and envelope upgrades. SHEMS provides an opportunity for demand response measures to be combined with the energy efficiency focus of HOMES. This will help put less stress on the grid at peak and will allow further recognition of the energy efficiency benefits of all energy using and connected devices in the home.



- In addition, such systems can be the way to implement the section of the HOMES legislation that allows states to value savings for time, location and or GHG emissions.
- Samsung SmartThings Energy, which obtained the first mass-market qualification for SHEMS ENERGY STAR, is compatible with over 200 other companies' products.
- SHEMs and IOT platforms with energy use data integration, and marketing can educate, enroll, and execute rebates. Platforms can increase engagement across a variety of energy saving methods over time as users engage with these platforms more often than utility marketing assets.
- Utilities should formalize best practice for data integrations so platforms can invest in this space to help educate the customer.

Offering Choices for Energy Efficient Options for Consumers

- New Jersey should not limit rebates to US manufactured goods as this would significantly limit the available options for consumer choices 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 counterproductive 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 appreciates the opportunity to comment on New Jersey Request for Public Input for IRA home rebates. We would gladly welcome the opportunity to discuss these matters further with the state of New Jersey, either in Trenton, Ridgefield Park, or elsewhere.

Respectfully submitted,

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