



**LG Electronics U.S.A., Inc.**

111 Sylvan Avenue, Englewood Cliffs, NJ 07632

T. 201-816-2000 www.lg.com

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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**

**LG Electronics – Comments on New Jersey’s IRA Consumer Rebate Programs**

Dear New Jersey Board of Public Utilities Staff,

LG Electronics U.S.A, Inc. (“LG”) submits the following comments in response to the New Jersey Board of Public Utilities on its Request for Information on the implementation of the federal Inflation Reduction Act HOMES and HEEHR rebate programs.

LG Electronics, U.S.A, Inc. is a leading global producer of energy-efficient home appliances and HVAC systems, based in Englewood Cliffs, NJ. We at LG Electronics are excited by the news that New Jersey will be applying for funding from the U.S. Department of Energy for the two consumer rebate programs created by the Inflation Reduction Act. We have a strong presence in New Jersey, including a network of residential HVAC distributors and contractors who are active in New Jersey’s Clean Energy Programs. We are also an active participant in the Energy Efficiency Stakeholder group meetings, run by the Board of Public Utilities. It is our position that through engagement with product manufacturers, like LG Electronics, the New Jersey Board of Public Utilities will be able to most effectively implement broad reaching rebate programs that influence consumers to adopt the highest efficiency appliances on the market today.

LG Electronics shares New Jersey’s vision for a sustainable future and acknowledges the importance which electrification will play in decarbonizing the building sector. Therefore, we offer the following suggestions on New Jersey’s rebate programs:

1. We believe that to drive the greatest rates of home electrification, New Jersey should utilize point of sale, appliance rebate funding to provide consumers with to access rebates for heat pump HVAC systems, heat pump hot water heaters, electric stoves, and heat pump clothes dryers, as allowed by the U.S. Department of Energy.
  - a. While heat pump HVAC technology adoption has reached all-time highs, other technologies essential to decarbonizing the building stock, such as heat pump water heaters, induction cooktops, and heat pump dryers, are still nascent and face low rates of consumer adoption. This federal funding offers New Jersey the opportunity to lower and potentially eliminate the cost premiums associated with these products for eligible consumers, dramatically reducing return on investment timeline.



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- b. Consumer adoption rates send market signals to manufacturers which determine processes, such as production amounts and product price points. The more incentives boost consumer adoption, the more confident manufacturers will be to invest in the technologies necessary for building electrification.
2. We encourage New Jersey to offer the home efficiency and electrification rebates to all income levels deemed eligible by the U.S. Department of Energy.
  - a. LG Electronics acknowledges the importance of deploying efficient appliances in low-income households and disadvantaged communities who have been disproportionately affected by climate change and frequently face high energy cost burden. We believe those goals will be adequately achieved through the minimum funding allocations presented by the U.S. Department of Energy.
  - b. For the HEAR program, we believe that including households with incomes of up to 150% of AMI will allow for broader development of markets for efficient technology and lower the cost premiums associated with the most efficient, high-quality appliances.
3. We request that New Jersey provide advanced notice of rebate program development to manufacturers and retailers to allow for seamless program implementation.
  - a. Manufacturers, including LG Electronics, will require advanced lead times to ensure rebate eligible products are in stock at participating retail locations. By providing as much information as possible in advance of program launch, New Jersey will ensure consumers will not face product shortage issues.
  - b. Retailers, including online retailers, will require advanced notice of program specifics to prepare their systems and processes to participate in New Jersey's rebate programs.

We at LG Electronics intend to support the implementation of the IRA consumer rebate programs in New Jersey and would like to be a resource wherever possible. Should there be further interest in learning more about the highly efficient technology used in LG Electronics products for home electrification, please do not hesitate to reach out.

Thank you,

David Kim

A handwritten signature in black ink, appearing to read 'David Kim', written in a cursive style.

Team Lead, Sr. Manager, NA Policy & Product Regulation

NA Policy & Regulatory Affairs Dept.

**LG Electronics U.S.A., Inc.**

[David6.Kim@lge.com](mailto:David6.Kim@lge.com)