

To: EPA

Regarding the Draft Lab Requirements proposed by the EPA. ClimateMaster Inc. is a manufacturer of geothermal heat pumps and a member of AHRI (Air-conditioning, Heating and Refrigeration Institute). It is ClimateMaster's position that AHRI's certification program serves the purpose that the EPA desires to ensure that all Energy Star geothermal heat pumps meet the performance levels that have been published by each manufacturer. The Energy Star program for geothermal heat pumps has been recently revised to version 3.0. In this version the WSHP section of AHRI requested that the EPA make certification by a 3rd party certification body a requirement. These requirements were written into version 3.0 but are still under development by the EPA. Below is that section from the "Energy Star Program Requirements for Geothermal Heat Pumps Partner Commitments Version 3.0"

"Product Certification Requirements: To participate in the ENERGY STAR program, each model must be certified by an EPA approved third-party certification organization according to requirements developed for the ENERGY STAR Enhanced Verification Program. These requirements are still to be determined and will be developed through a separate stakeholder process. The effective date for these requirements will be determined as part of these broader ENERGY STAR testing efforts."

ClimateMaster urges the EPA to finalize the section above requiring 3rd party certification bodies such as AHRI to certify the performance of Energy Star geothermal heat pumps utilizing the certification program that AHRI currently has in affect. If the EPA follows through with the program set forth in the draft this will result in the unnecessary cost of additional testing and duplicate testing to the AHRI certification program.

Regards,

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