



October 9, 2009

Mr. Andrew Fanara
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: EPA Proposed Draft 1 Energy Star Specification for Geothermal Heat Pumps

Dear Andrew:

These comments are submitted by the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) in response to the U.S. Environmental Protection Agency (EPA) proposed draft 1 Energy Star specification for geothermal heat pumps, issued on September 17, 2009. AHRI is the trade association representing manufacturers of heating, cooling, and commercial refrigeration equipment. More than 350 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the HVACR industry produces more than \$20 billion worth of product, and in the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers and contractors.

AHRI fully supports the draft Energy Star requirements for geothermal heat pumps. The proposed specification is a significant improvement over the current program. In particular, the inclusion of water-to-water units is a great addition to the specification as it will provide more product choices to consumers. We also support the new performance levels. These new efficiencies are significantly more stringent than current levels and will promote the use of highly-efficient products.

AHRI further applauds the addition of third-party certification requirements to the specification. We strongly believe that it is only through third-party certification testing that accurate and unbiased evaluations of product performance can be achieved. Adding this requirement significantly strengthens the credibility of the Energy Star program while ensuring a level playing field for all manufacturers. However, the challenge procedure requirements proposed in the draft are too vague. We recommend that EPA outline the procedure in more detail. EPA can consult section 10 of AHRI's General Certification Operations Manual for

additional information on the challenge test procedures¹. In addition, we feel strongly that EPA should require accreditation of third-party certification organizations to ISO 65. Such an accreditation will offer additional assurances to EPA that the certification organization has a quality control system in place to ensure proposer internal control mechanisms essential to identify problems and continuously improve service.

With respect to data submittal, we urge EPA to allow third-party certification organizations such as AHRI to provide Energy Star qualifying products through online directories of certified products. Allowing the use of a certification directory will streamline the data submission process. Finally, we would like to point out a typo on pages 1 and 2 of the draft where “commercial griddles” appears several times instead of “geothermal heat pumps”.

AHRI appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Amrane', with a stylized, cursive script.

Karim Amrane
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¹ <http://www.ahrinet.org/ARI/util/showdoc.aspx?doc=498>