

To Whom It May Concern:

I am strongly in favor of the water-to-water geothermal heat pump inclusion in the proposed Draft 1 Version 3.0 specifications.

I strongly believe that current water-to-water geothermal heat pumps should have been included in the original specifications and the oversight should have been corrected long before this.

I am a homeowner whose home is heated hydronically. I currently have a 50-year-old natural gas boiler just waiting to fail. If I were to replace my boiler today with an efficient gas boiler, I would receive the 30% tax credit because hot water boilers, even though they are far less efficient than geothermal heat pumps, qualify. If I were to replace my central air heat pump, all I would need is 8% improved efficiency to qualify for the 30% tax credit.

However, if I replace both my boiler and my air conditioning with a water-to-water geothermal heat pump, even though my efficiency increases (in the absolute worst case) by 30%, I cannot qualify for a tax credit because, for whatever reason, water-to-water geothermal heat pumps are somehow not deemed efficient enough to have earned the ENERGY STAR rating.

Modifying the ENERGY STAR certification to include water-to-water geothermal heat pumps should be a no-brainer, and really shouldn't have had to wait for all the other improvements being proposed in Draft 1.

Today, an EPA employee suggested to me, "No one complained in 2002." I am sure that is correct. However, prior to the current change in Tax Credits, the \$2000 cap on energy credits was clearly not high enough to make geothermal a financially viable option.

To be forced to wait one more heating season is totally unacceptable, and goes against everything for which our energy conservation program stands.

Even the ENERGY STAR website clearly makes this case:

"Because they use the earth's natural heat, they are among the most efficient and comfortable heating and cooling technologies currently available."

Please enact certification for water-to-water geothermal heat pumps today.

Earl H. Nicholas