

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF AIR AND  
RADIATION

April 27, 2020

Dear ENERGY STAR® Geothermal Heat Pump Brand Owner or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the enclosed amendment to the [ENERGY STAR Geothermal Heat Pump \(GHP\) specification](#), which adds a category and requirements for direct geexchange (DGX)-to-water heat pumps. Stakeholders are encouraged to submit comments on this amendment to EPA no later than May 25, 2020.

ENERGY STAR recognizes that GHPs are among the most efficient heating and cooling technologies available to residential consumers. In an effort to continue to recognize all efficient products in this category, EPA has drafted this proposal to include a category for DGX-to-water heat pumps. While this type of unit had not previously been prevalent in the market, or included in the referenced test method, stakeholders have expressed that these units are available and could provide a geothermal option to consumers who have limited yard space and a hydronic distribution system.

**Proposal Summary**

In the interest of expanding the scope of this specification to include all geothermal options, EPA has revised the definitions for DGX units to explicitly include units that exchange heat with an indoor hydronic distribution system for heating and cooling. Separate energy efficiency requirements for DGX-to-Water units have been defined in this draft, in a manner consistent with the efficiency performance of that technology. The test method for DGX units has also been updated to reference the latest version, AHRI 870-2016, which includes provisions for testing DGX-to-Water units.

To provide further clarity on the current energy efficiency requirements, EPA has removed the Tier 1 and 2 requirements, which were superseded by Tier 3 on January 1, 2012.

**Comment Submittal Process**

Stakeholders are encouraged to provide written comments to [ghps@energystar.gov](mailto:ghps@energystar.gov) by **May 25, 2020**. Given the current circumstances, EPA has extended this comment period by two weeks. All comments will be posted to the ENERGY [ENERGY STAR GHP Product Development](#) website unless the submitter requests otherwise.

Please direct any specific questions to Abigail Daken, EPA, at [daken.abigail@epa.gov](mailto:daken.abigail@epa.gov) or (202) 343-9375, and Julia Hegarty, ICF, at [julia.hegarty@icf.com](mailto:julia.hegarty@icf.com) or (202) 862-1163. Thank you for taking the time to review this Draft document. I look forward to working with you to amend the ENERGY STAR GHP specification.

Sincerely,

A handwritten signature in black ink, appearing to read "Abigail Daken".

Abigail Daken, Product Manager  
ENERGY STAR for HVAC