Commercial systems almost always have to be separate from the storage tank. The amount of cooling that is done in the immediate area is quite significant and is impractical in most applications that we see. It is not often that the cool air can be ducted from the tank location in a practical manner. It is important that the standards be based on both indoor and outdoor systems, both air source and water source, and the ability to operate to at least 150F. The air source outdoor units need to have a defrost system if they are used in most of the USA. Rating should be published at 15F, 30F, 50F, 70F and 90F. There should be a standard approach for calculating annual operating costs based on location and source conditions. One piece heat pump/tanks will be quite rare in real life. Standards should be based on what will be the vast majority of installations, separate heat pumps and tanks. We have built commercial systems and have a number of projects in review and these comments are based on what we see often.

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