



Systems of Nantucket
7A Nobska Way
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November 23, 2009

ghps@energystar.gov
Mr. Andrew Fanara
Environmental Protection Agency

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

Dear Andrew:

As a GHP system installer/designer I commend the EPA for its pending inclusion of Water-to-Water Geothermal Heat Pumps in the Energy Star family. Hydronic heating and cooling systems with GHP have the potential for greatest efficiency and unsurpassed comfort.

However I am concerned that some of the most efficient W-W GHP products might be **inadvertently excluded**. Some manufacturers have models that are heating only and/or domestic demand water heaters, thus unable to provide an EER in testing, yet have the highest COP's in the industry. We would be doing the consumer and EPA intentions a disservice if these products do not receive the Energy Star recognition they deserve. Furthermore this exclusion would hamper the promotion and development of such technologies.

With this in mind please consider the following **changes** in the final specification:

-From Final Draft lines 159-160

A geothermal heat pump model may provide space heating or space cooling or domestic water heating, or a combination of these functions

-From Final Draft lines 240-244

2) Qualifying Products: For purposes of ENERGY STAR qualification, geothermal heat pumps include the following: open loop, closed loop, and DGX that are powered by single phase current. The specifications in Section 3 apply to single stage models. Multi-stage models may be qualified based on $EER = (\text{highest rated capacity EER} + \text{lowest rated capacity EER})/2$; and $COP = (\text{highest rated capacity COP} + \text{lowest rated capacity COP})/2$. **Dedicated cool only or heat only models may be qualified based on their respective EER or COP.**

Respectfully Yours,

Preston Buckley
DBA GeoExchange Systems of Nantucket