

Dear Mr. Fanara:

First, I want to support the decision to include water-to-water geothermal heat pump equipment under the Energy Star rating system. There has been a significant gap in not having water-to-water equipment listed and their inclusion will be beneficial for our customers and for the wider application of GHP technology.

Second, I wish to clarify the effective dates of the changes. One document (title below) indicates Sept. 1, 2009 for Tier 1 and Jan. 1, 2013 for Tier 2.

**ENERGY STAR® Program Requirements for  
Geothermal Heat Pumps  
Eligibility Criteria**

Below is the Version 3.0 product specification for ENERGY STAR qualified geothermal heat pumps...

However, information I received from an equipment manufacturer has other dates: Dec. 1, 2009, Aug. 1, 2010, and Jan. 1, 2012. Please clarify.

Third, I'm inquiring about water-to-water equipment ordered and shipped prior to the first effective date (which ever one applies) for GHP system installations not yet complete or to be completed after the effective date. The equipment ordered already meets the Tier 1 efficiency standards:

TIER 1		
Energy-Efficiency Criteria for Qualified Geothermal Heat Pumps		
Product Type	EER	COP
Closed Loop Water-to-Air	16.1	3.5
Open Loop Water-to-Air	18.2	3.8
<b>Closed Loop Water-to-Water</b>	<b>15.1</b>	<b>3.0</b>
<b>Open Loop Water-to-Water</b>	<b>19.1</b>	<b>3.4</b>
DGX	15.0	3.5

The manufacturer will make no substantive changes in the water-to-water product line to meet Energy Star criteria other than for incidental labeling requirements. Is there a process for inclusion of that equipment for those specific systems as meeting the spirit of the law for the purposes of EESA 2008 tax credit eligibility?

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**Sustainable Energy Initiatives**

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