

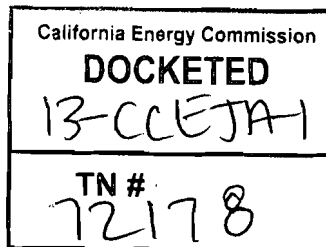
Energy - Docket Optical System

From: Doug Dougherty [doug@geoexchange.org]
Sent: Thursday, October 24, 2013 1:10 PM
To: Energy - Docket Optical System
Cc: Ted Clutter; Phil Henry
Subject: FW: Docket: 13-CCEJA-1 / Comments on Proposition 39 - Draft Guidelines for School Energy Projects

Categories: Ready to Docket

Date: October 24, 2013

Docket: 13-CCEJA-1



Email: docket@energy.ca.gov

Subject: GEO Comments on Proposition 39 - Draft Guidelines for School Energy Projects

The Geothermal Exchange Organization (GEO) is the national trade association for manufacturers and companies involved in all aspects of geothermal heat pump deployment in the United States.

GEO is concerned that in their current form, the Prop 39 Draft Guidelines for School Energy Projects places such a low priority on geothermal heat pump systems (GHPs) compared to other heating, ventilation and air conditioning (HVAC) options, e.g. "Priority 5." (Second revision, pg. 36).

This is unacceptable, considering that GHPs are much more efficient than air-source HVAC equipment. Indeed, the U.S. Department of Energy and the U.S. Environmental Protection Agency call geothermal systems the most efficient and environmentally friendly heating and cooling technology available.

GEO believes that the priority should be equal to conventional HVAC options. Assigning such a low priority to GHPs conflicts directly with real world experience with GHP deployment across North America—as well as statements that favor geothermal systems in California's own Draft 2013 Integrated Energy Policy Report (IEPR):

- "While purchase and installation costs can be higher than those of conventional heating or cooling systems, geothermal heat pump systems can use 25 percent to 50 percent less electricity."
- "The Energy Commission supports the proper design and installation of geothermal heat pump technologies as a strategy for meeting California's energy efficiency goals."

GEO also asks that in your draft, GHPs systems given fair treatment alongside other heating and cooling systems, without inhibiting language such as "when conditions allow," and calling for "custom audits," that alternative systems may not be subject to.

Thanks for the opportunity to comment on California's Proposition 39 - Draft Guidelines for School Energy Projects (Docket 13-CCEJA-1).

Respectfully submitted,

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