

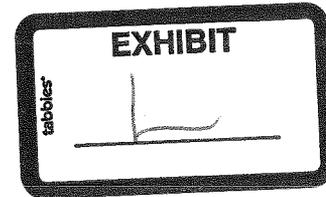


HOME BUILDERS ASSOCIATION OF CONNECTICUT, INC.
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*Your Home
Is Our
Business*

April 22, 2008

The Honorable Jerry Farrell, Jr.
Commissioner
Department of Consumer Protection
165 Capitol Avenue, Room 103
Hartford, CT 06106



Re: Comments – Proposed Amendment to Section 25-128-34 of the Regulations of State Agencies

Dear Commissioner Farrell,

Thank you for the opportunity to comment on the state Department of Consumer Protection's proposed amendments to Section 25-128-34, the Connecticut Well Drilling Code.

The Home Builders Association of Connecticut opposes the proposed regulations, which outline a one-size-fits-all approach to geothermal systems by limiting choice of material and design to certain systems. This only serves to limit builder flexibility to utilize systems which are appropriate to each home and undermines the ability of homebuilders to adapt to a changing market.

For example, direct exchange geothermal (DX geothermal), which uses copper tubing to transfer the earth's thermal energy to heat and cool homes, is a proven technology that has saved homeowners a significant amount in energy costs. The United States Environmental Protection Agency has recognized DX geothermal as one of the most efficient, safe and reliable geothermal systems available. Faced with considerable increases in fuel and electric costs, homeowners are looking for ways to incorporate safe, energy efficient systems into their homes.

Recognizing this, the state has supported and encouraged the development of geothermal systems, such as DX geothermal, through grant programs, tax credits and other incentives. We are therefore concerned, that as currently drafted, the proposed regulations arbitrarily limit the geothermal options available to consumers.

We urge the department to revise the proposed regulations to specifically authorize the use of materials, design and procedures required to promote direct exchange geothermal technology systems.

Thank you for considering our comments on this proposed regulation.

Sincerely yours,

William H. Ethier, CAE
Executive Vice President

cc: Liz Verna, Chair, Government Affairs Committee, HBACT

Representing the Home Building, Remodeling and Land Development Industries In Connecticut
"Enhancing Our Member's Value to Their Customers and Our Industry's Value to Society"