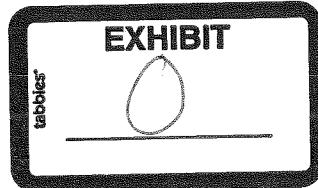


# ADVANCED GEOTHERMAL TECHNOLOGY

by ECR Industries, Inc. makers of  
*The Great Aire Comfort System™*  
P.O. BOX 6469, READING, PENNSYLVANIA 19610  
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April 22, 2008

Mr. Jerry Farrell, Jr.  
Commissioner  
Department of Consumer Protection  
Room 103  
State Office Building  
165 Capitol Avenue  
Hartford, CT 06106



## Re: Notice to Amend Regulations

Dear Mr. Farrell:

We must focus on controlling Carbon. 80-90 % of GHG are due to Carbon Dioxide

A major way to free ourselves in the near & future oil dependence is by using direct exchange (DX) geothermal systems.

Direct Exchange (DX) is environmentally friendly as well as being economically affordable & do able.

What makes DX so exciting & cost effective is that—4/5's of the heat produced is from God's good earth. The other 1/5 is produced by an electrical device, which is a motor compressor.

Difference between a DX System & a Closed Water Loop System Heat Transfer Process is as follows. **DX Process** - heat is transferred from the ground through the copper piping to the refrigerant. Copper is an excellent conductor of heat. **Closed Water Loop System** - heat is transferred from the ground through the plastic pipe (which is more of an insulator) to the water & then to the refrigerant.

In a DX system we have eliminated the water as a heat transfer medium. Thus, we have eliminated the need for a water pump, which is another electrical device that can fail.

A DX system is the least disruptive to the surface of the earth. We only go down to a depth of sixty feet (60) as opposed to a closed water loop that can go down hundred's (100's) of feet. The holes for a DX System are three inches in diameter & the holes for a closed water loop are six inches in diameter.

Return on Investment (ROI) is 3-6 years for DX systems. If you look at a photovoltaic system ROI is 12-15 years.

With a DX system you can save 40-60% annually on your heating, air-conditioning & hot water needs.

DX uses refrigerant in its system. This refrigerant has the following properties:

Boils @ -41degrees F

Non-Toxic

Non-Corrosive

Non-Flammable

Non-Poisonous

Odorless

Colorless

We use & are exposed to refrigerants in our daily lives in our homes (refrigerators, air-conditioning, auto's) - also in supermarkets & malls that we frequent.

We use Cathodic Protection (Sacrificial Anode) to address the issue of possible corrosion of the copper tubing for certain acidic soils.

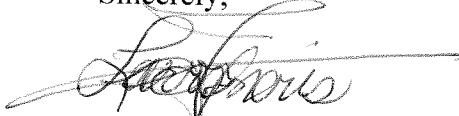
Closed water loop systems use an anti-freeze base which as a solution gets colder becomes more viscous (thicker like oil does) which means it is harder to pump.

DX for new construction is an easy decision for the home owner since no investment has been made for a heating & air-conditioning system. Retrofit applications require minor alterations to install. The existing system can be used as the secondary or backup heat. The DX would be used as the primary source of heat.

There are three (3) positive things that you get with DX systems:

- COMFORT
- ECONOMY
- ENVIRONMENTALLY FRIENDLY

Sincerely,



Larry Forneris  
Sales Manager