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To: !FHFA REG-COMMENTS Subject: RIN 2590-AA53

FHFA General Counsel Alfred M. Pollard

PACE will help establish geothermal heat pump systems in low income homes and for average Americans to install and afford geothermal heat pump systems to save 50% of energy cost.

The state and local governments should have the rights to establish PACE for Geothermal heat pump systems.

PACE is a win win system for FHFA and the general public.

One rule should be established that says ground source heat pumps should be established first before solar or wind turbines are installed with PACE as a foundation. When you save 50% of the energy cost with ground source heat pumps then solar and wind turbines can be less.

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