

Appliance Standards Awareness Project

July 29, 2019

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 18-AAER-06: Hearth Products

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the California Energy Commission's Draft Staff Report Analysis of Proposed Efficiency Standards and Marking for Gas Hearth Products. We appreciate the opportunity to provide input.

We are pleased that the Energy Commission is moving forward with proposed standards for gas hearth products. Gas hearth products represent a significant source of energy waste, and yet there are currently no state or federal efficiency standards in the U.S. for these products. Energy Commission staff have conducted a thorough analysis which supports the proposed standards, and as described in the Draft Staff Report, staff have also conducted significant outreach to manufacturers and other stakeholders to inform the proposal.

We support the Energy Commission's proposed standards for gas hearth products. The proposed design standards would eliminate the use of wasteful standing pilot lights and provide additional savings by minimizing on-demand pilot light energy consumption on all products and the main burner operation on decorative fireplaces. The proposed performance requirement would ensure that all heating gas fireplaces meet a minimum level of heating efficiency of 70%. The Energy Commission estimates that the proposed standards would save California consumers \$31 million annually after stock turnover, and the standards are cost-effective for all product types and pilot types.

We support the proposed scope of coverage. The proposed scope would cover all the major types of gas hearth products sold in California including vented gas fireplaces (both heating and decorative), vented gas logs, and outdoor gas fireplaces and gas logs.¹ In our comments on DOE's 2015 proposed rule for hearth products, we described how manufacturers had developed solutions to address the potential challenges associated with using intermittent ignition (i.e. electronic ignition) for gas logs.²

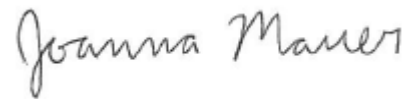
The Energy Commission's analysis shows that there are multiple paths to meeting the proposed standards and there is wide availability of compliant products. The Draft Staff Report identifies multiple pilot types that meet the proposed design standards including interrupted pilots, intermittent pilots, on-demand pilots, and dual-pilot capability systems. The Draft Staff Report also identifies various technology options that can improve the heating efficiency of heating fireplaces such as adjusting the air-to-fuel ratio, installing an air-circulating fan, and adding a condensing heat exchanger. Energy Commission staff found that there are heating fireplace models that meet the proposed heating efficiency performance standard across all input capacities and fireplace configurations and with all pilot types.

¹ Unvented hearth products are not permitted for sale in California.

² <https://www.regulations.gov/document?D=EERE-2014-BT-STD-0036-0043>.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Joanna Mauer". The script is cursive and fluid, with the first letters of each word being capitalized and larger than the rest of the letters.

Joanna Mauer
Technical Advocacy Manager