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HPBA Pacific Comments on 2016 Draft Residential Manual

Additional submitted attachment is included below.



July 31, 2015

To: California Energy Commission Dockets Office
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Docket No. 15-BSTD-02

From: Hearth, Patio and Barbecue Association, Pacific Affiliate

RE: Comments on the 2016 Draft Residential Compliance Manual

The Hearth, Patio & Barbecue Association (HPBA) is the national not-for-profit trade association that represents and promotes the interests of the hearth products industry in North America. With HPBA, HPBA Pacific is the local affiliate of the National organization which covers California, Nevada and Hawaii. Over 200 members in these states are retailers, service companies, and distributors which sell, install and service hearth products and appliances. HPBA appreciates the opportunity to submit these comments to the 2016 Draft Residential Compliance Manual. We also support the drive toward more energy efficient buildings.

Following are a list of comments on specific sections of the 2016 draft.

- 3-66 continuously burning pilots in conditioned space- The current draft states: The Energy Standards have mandatory requirements to limit infiltration associated with fireplaces, decorative gas appliances, and gas logs. Fireplace efficiency can be greatly improved through proper air control, reduced infiltration is also a benefit when the fireplace is not operating (the majority of the time for most homes). While it is true that the energy code has prohibited pilot lights in *Decorative* gas fireplaces for many years, it is also true that the CEC Appliance Efficiency Program does recognize several Room Heater type fireplaces as including a pilot light. Every three years this issue causes confusion for at least some local building officials in our state. We recommend a note reminding AHJ's (Authorities Having Jurisdiction) that there is a distinction in this regard.
In this section, we would also like to recommend this Question and Answer be added:
Question: Are outdoor fireplaces allowed to have a continuously burning pilot light?
Answer: The California Energy Commission does not regulate outdoor fireplaces and equipment. Therefore, this is not applicable to these standards. Outdoor decorative gas fireplaces and appliances can be found in ANSI Z21.97 standards.



- 4-27 Exemption from 150.0(m)1—Ducts and fans integral to a wood heater or fireplace are exempt from Standards §150.0(m)1. We agree on this exemption. Ducting on heat producing fireplaces are rare, but should be exempt from any duct tightness (duct blasting) or insulation standards. Their ducting typically is very short and not outside the thermal envelope of the home and typically in the same pressure boundary of the room.
- 4-68 Example 4-5, and 4-6. HPBA appreciates these question and answer examples and agrees.
- 4-95 Combustion and solid fuel burning appliances—~~4.6.6.4 Combustion and Solid Fuel Burning Appliances From ASHRAE 62.2-2010, Section 6.4 6.4 Combustion and Solid Fuel Burning Appliances~~ Combustion and solid fuel burning appliances must be provided with adequate combustion and ventilation air and vented in accordance with manufacturer's installation instructions, NFPA 54/ANSI Z223.1, National Fuel Gas Code, NFPA 31, Standard for the Installation of Oil Burning Equipment, or NFPA 211, Standard for Chimneys, Fireplaces, Vents, and Solid Fuel Burning Appliances, or other equivalent code acceptable to the building official. Where atmospherically vented combustion appliances or solid fuel burning appliances are located inside the pressure boundary, the total net exhaust flow of the two largest exhaust fans (not including a summer cooling fan intended to be operated only when windows or other air inlets are open) shall not exceed 15 cfm/100 ft² (75 Lps/100 m²) of occupiable space when in operation at full capacity. If the designed total net flow exceeds this limit, the net exhaust flow must be reduced by reducing the exhaust flow or providing compensating out. While HPBA understands that the commission has adopted ASHRAE 62.2, we would recommend that at least the 2nd paragraph (4.6.6.4) be retained as an informative note. This is excellent language, and could be offered as an example. The note on Direct Vent appliances is also very useful to retain.

Thank you for taking the time to review our comments.

Respectfully,

Kaity Rosengren
HPBA Pacific Affiliate Manager
2304 Huntington Drive Ste. 210
San Marino, CA 91108
kaity@hpbapacific.org
626-237-1200

