

# Independence Marketing & Distribution

2751 Eagles Peak Lane, Lincoln, CA 95648  
Office & Fax (916) 543-6304 Cell (916) 502-4898  
Mike Derosier, Owner

<b>DOCKET</b> <b>10-BSTD-01</b>
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DATE	JUL 30 2011
RECD.	JUL 30 2011

July 30, 2011

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 10-BSTD-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
By email to: [docket@energy.state.ca.us]

Dear Mazi Shirakh;

As a California homeowner and businessman I appreciate the need for improving energy efficiency in residential housing. I consider the work done by the CEC on Building Energy Efficiency Standards, Title 24, part 6, valuable and necessary.

I belong to the Hearth, Patio & Barbeque Association (Pacific-HPBA) and serve on its' board of directors. This association represents manufacturers, distributors, sales agents and hundreds of California retailers. Our HPBA association members are part of the California supply chain for hearth category products such as vented gas burning fireplaces, stoves, gas logs, chimneys, venting, and fireplace accessories.

After attending two meetings with CEC personnel, I am concerned that the CEC is not recognizing the current and future value of zone heating in ongoing Title 24, part 6 improvements. My comments are only addressing vented gas heating fireplace equipment. These fireplace appliances are regulated by DOE under NAECA Standards and the CEC under the appliance efficiency standards as Direct Heating Appliances.

Specifically, I'm asking the CEC to maintain the residential zone credit for heating, also known as the two-zone modeling credit, outlined in section 4.5.2 of the Residential ACM:

- Compliance software should have the capability to be able to monitor two zones.
- Heating and cooling should be evaluated separately. Heating differently in living and sleeping zones is common behavior.
- Sacramento and other Air Quality Districts encourage the use of our gas heater products in this two-zone application.

Respectfully submitted,

Mike Derosier, Owner  
Independence Marketing & Distribution

CC: Chair Robert Weisenmiller, Ph.D  
Commissioner Karen Douglas  
Deputy Director Panama Bartholomy  
Bruce Wilcox, P.E.