

**DOCKETED**

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# Hearth Products Workshop

Developed by Energy Solutions  
On behalf of the California IOUs

June 6, 2019



# History of Regulations

- U.S. DOE originally pursued regulations for “vented hearth heater” products as part of standards for “Residential Water Heaters, Direct Heating Equipment, and Pool Heaters”
  - April 2010: Final Rule
  - July 2011: Updated Final Rule with amended definition of decorative hearth products
  - 2011: Hearth, Patio & Barbecue Association (HPBA) sued and won regarding decorative gas hearth products
  - Feb 2013: Vented hearth heater standards are vacated
  - Feb 2015: NOPR for gas-fired hearth products
  - March 2017: U.S. DOE withdraws rulemaking
- California Investor-Owned Utility (IOU) participation
  - Title 20 – June 2018 CASE Report
  - Title 20 – February 2019 CASE Report with Addendum
- **The Statewide CASE Team supports the Energy Commission moving forward with hearth product efficiency standards**

# Energy Commission Staff Report and CASE Report

## May 2019 Energy Commission Staff Report

**Scope:** Vented gas fireplace heaters, vented decorative gas fireplaces, vented gas logs, outdoor gas logs and fireplaces

**Design Standard:** All products have on-demand pilot (max 7 days) and cannot have continuous pilot; Decorative gas fireplaces equipped with auto shut-off device (max 24 hours)

**Performance Standard:** Minimum Fireplace Efficiency (FE) requirement of 70% in vented heating gas fireplace

**Test Procedure:** CSA P.4.1-2015

**Reporting Requirements:** Test and list

**Marking Requirements:** Vented decorative gas fireplaces shall mark that they are decorative and not a source of heat

## February 2019 CASE Report

**Scope:** Vented gas fireplaces (decorative & heating), inserts, and gas logs, and outdoor products

**Design Standard:** Ban the use of standing pilot lights in all products

**Performance Standard:** Minimum FE requirement of 75% in vented gas fireplace heaters

**Test Procedure:** CSA P.4.1-2015

**Reporting Requirements:** Test and list

**Marking Requirements:** None

# Savings Comparison between CASE Report and Energy Commission Staff Report

Metric	CASE Report	Staff Report
First Year Savings (MMBtu)	154,129	105,157
Stock Turnover Savings (MMBtu)	2,213,231	2,429,175
CO2 Savings (Metric tons)	123,835	129,721
Benefit-to-Cost Ratio	4.35	1.1-19.8

# **CASE TEAM COMMENTS ON ENERGY COMMISSION STAFF REPORT**

# Support of Energy Commission Proposal

The Statewide CASE Team strongly supports the Energy Commission's initiative to set hearth product energy conservation standards.

- Cost effective, savings of over 150,000 MMBtu in the first year and over 2,200,000 MMBtu after stock turnover
- Standing pilot lights are wasteful
- Support additional proposed design requirements
- Support marking requirements for vented decorative gas fireplaces
- California is showing leadership by setting hearth product energy conservation standards

# 75% FE is Cost Effective

The Statewide CASE Team notes that our proposal for a 75% FE level is cost-effective.

- 75% FE level, combined with proposed design standard, has B/C ratio of 4.35 (CASE Report)
- There are at least 59 unique models with an FE of 75% or greater (Energy Commission analysis)



# Gas Logs and Outdoor Products

The Statewide CASE Team is supportive of the Energy Commission including gas logs and outdoor products in their scope.

- Support inclusion of gas logs and outdoor products
- Gas logs and outdoor products help realize additional energy savings
- There are many of these types of products without standing pilot lights (Energy Commission analysis)

# Reporting Requirements

The Statewide CASE Team proposes a modification to the reporting requirements to include vented gas log as a type for the “vented gas hearth product type” category.

- Support reporting requirements
- For certification to the Modernized Appliance Efficiency Database System (MAEDbS), recommend updating one of the options for the “vented gas hearth product type” to include vented gas logs
- Want to ensure gas log products are required to report to MAEDbS

# Test Procedure Modification are Reasonable

The Statewide CASE Team supports modifications to the test procedure for measuring  $Q_p$ .

- Support the adoption of CAN/CSA P.4.1-2015 as the test procedure for measuring FE
- Support inclusion of multiplication factor to measure interrupted pilots and intermittent pilots with on-demand capability to ensure these pilot lights are properly covered by the rulemaking

# Summary

- The Statewide CASE Team supports the Energy Commission's efforts to set hearth product standards
- Requiring a 75% FE level for vented gas fireplace heaters is cost-effective.
- The Statewide CASE Team is supportive of the Energy Commission including gas logs and outdoor products in their scope.
- The Statewide CASE Team proposes a modification to the reporting requirements to include vented gas log as a type for the "vented gas hearth product type" category.
- The Statewide CASE Team supports modifications to the test procedure for measuring  $Q_p$ .