

<b>DOCKETED</b>	
<b>Docket Number:</b>	18-AAER-06
<b>Project Title:</b>	Hearth Products
<b>TN #:</b>	223772
<b>Document Title:</b>	Wolf Steel Ltd. Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Wolf Steel Ltd
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/11/2018 2:51:55 PM
<b>Docketed Date:</b>	6/11/2018

*Comment Received From: Paul Hodges*  
*Submitted On: 6/11/2018*  
*Docket Number: 18-AAER-06*

**Wolf Steel Comments**

*Additional submitted attachment is included below.*



2018-06-11

California Energy Commission  
Office of the Chief Counsel  
1516 Ninth St. MS 14  
Sacramento, CA 95814-5515  
U.S.A.

To Whom it May Concern,

First of all, we thank the California Energy Commission for inviting us to participate in this very important process of regulation development. It is our opinion that Gas Hearth Products are extremely unique in their nature and we appreciate the opportunity to highlight some of those unique qualities.

Wolf Steel Ltd is one of the largest privately-owned Hearth Product Manufacturers in North America with several brands including Napoleon. With its head office and manufacturing facilities in Barrie Ontario, we also operate a manufacturing and warehouse facility in Crittenden Kentucky. Between both countries, we employ over 1,300 Associates.

- Regulations concerned with the efficiency levels of Gas Hearth Products should be focused exclusively on those designed to generate heat, such as those certified to the ANSI Z21.88 Test Standard for Vented Gas Fireplace Heaters. We believe the development of more efficient heating products should result in a reduction in the average amount of natural gas used over a products lifetime.
- Regulations concerned with the efficiency levels of Gas Hearth Products should **not** be focused on Decorative Gas Hearth Appliances certified to the ANSI Z21.50 Test Standard for Vented Decorative Gas Appliances that are designed primarily for their aesthetic value. We do not believe that increasing the efficiency of a decorative product for heating will result in any additional benefit to the consumer or in any measurable reduction in gas consumption.
- Decorative Gas Hearth Appliances certified to the ANSI Z21.50 Test Standard for Vented Decorative Gas Appliances commonly share the same Direct Vent technology the Heater rated models incorporate and while they are primarily Decorative in their nature, they do generate some heat as a by-product.
- The market for Decorative Gas Fireplaces places a low value on their ability to heat and a high value on the appearance of the appliance and its flame. Consequently, any regulation measuring and increasing the minimum efficiency requirements of Decorative Gas Fireplaces would be detrimental to the future of that market and the industry. We also believe it may confuse the consumer, should the distinction between the product categories, (i.e. decorative or heater), be reduced; which may lead a consumer to select the wrong product, with the outcome being the consumption of more gas over the products life.

#### CONTACT US

24 Napoleon Road  
Barrie, Ontario, Canada  
L4M 0G8  
705-721-1212

214 Bayview Drive  
Barrie, Ontario, Canada  
L4N 4Y8  
705 726-4278

103 Miller Drive  
Crittenden, Kentucky, USA  
41030  
859 428-9555



- Decorative Gas Appliances are infrequently used. Special events such as Christmas or other Family gatherings during the colder winter months are when they are most commonly used. Regulating these types of appliances with the intent of increasing their efficiencies would not have a significant impact on the conservation of natural or propane gas.
- There is little available data to conclusively demonstrate any specific method of using either a Heater Rated or Decorative Gas Fireplace. However, as a manufacturer we believe we do have insight with this regard. Most commonly gas fireplaces are used to enjoy the ambiance they create in the home. The heat they generate can be viewed as a beneficial by-product by some consumers, while some view it as an unwelcome side effect and still others are indifferent to it. Some users do use the product not only for their aesthetic value but also as a secondary source of heat to provide comfort in localized areas of the home such as a family room. However, all users appear to value the heat hearth products might provide in the event all other sources of heat in the home are temporarily inoperable due to some unforeseen event, (such as a power outage during winter).
- We agree with and support the use of the CSA P.4.1-15 Performance Test Method as a standard for comparing the efficiency of those Gas Fireplaces designed to generate heat. Typically, those models are certified to the Z21.88 Test Standard for Vented Gas Fireplace Heaters. (All of our current Gas Fireplaces are tested to P.4.1-15.)
- It is important to note that the P.4.1-15 Performance Test Method is by far the best standardized method of determining the heating efficiency of Gas Fireplaces. However, further development is necessary to capture the “real life” heating value these gas appliances provide. The hearth industry is working together with CSA and Canadian regulators to improve that methodology so that it better represents the method with which these appliances are utilized.
- The expected lifetime of our gas fireplaces is estimated to be 15 to 20 years.

Thank you again for this opportunity to share our insight into our industry and the products we manufacture. Please feel free to contact us directly or alternatively, the Hearth, Patio and Barbecue Association if you have any further questions.

Sincerely

David Shulver  
Vice President, Hearth, Heating, Ventilation, & Air Conditioning | Research & Development

NAPOLEON  
FIREPLACES | GRILLS | HEATING & COOLING

T: 705. 721.1212 x 515  
E: [DShulver@napoleonproducts.com](mailto:DShulver@napoleonproducts.com)

#### CONTACT US

24 Napoleon Road  
Barrie, Ontario, Canada  
L4M 0G8  
705-721-1212

214 Bayview Drive  
Barrie, Ontario, Canada  
L4N 4Y8  
705 726-4278

103 Miller Drive  
Crittenden, Kentucky, USA  
41030  
859 428-9555

[www.napoleonproducts.com](http://www.napoleonproducts.com)



Manufacturer Name	Model Name	Product Type	Certification	Venting Type	Main Burner Ignition Type	Age of Model	CSA P.A.1 Fireplace Efficiency Rating	BTU/hour Input Range
WOLF STEEL LTD	B30NTR	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	51.7	10,000 - 15,000
WOLF STEEL LTD	B30NTE	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	44.3	14,000 - 20,000
WOLF STEEL LTD	B30NTR	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	50.3	13,000 - 18,000
WOLF STEEL LTD	B40NTR	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	60.1	17,500 - 22,000
WOLF STEEL LTD	B40NTE	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	61.4	17,500 - 22,000
WOLF STEEL LTD	B0236CFQIN-2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	50.4	12,000 - 17,000
WOLF STEEL LTD	B0236CFNTR58	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	50.4	12,000 - 17,000
WOLF STEEL LTD	BHD4PQN	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	67.2	23,000 - 30,000
WOLF STEEL LTD	BHD4PN	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	67.2	23,000 - 30,000
WOLF STEEL LTD	BHD45TN	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	67.2	23,000 - 30,000
WOLF STEEL LTD	BHD45TN	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	60.4	23,000 - 30,000
WOLF STEEL LTD	BLS6NTE	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	44.1	12,000 - 17,500
WOLF STEEL LTD	BLS6NTE-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	44.1	12,000 - 17,500
WOLF STEEL LTD	BLS6NTE	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	44.1	17,000 - 24,000
WOLF STEEL LTD	OD28-1NG8	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	55.9	8000 - 11,500
WOLF STEEL LTD	OD28NT-PK28	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	54.4	16,000 - 26,000
WOLF STEEL LTD	OD28NT-TE58	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	54.4	16,000 - 26,000
WOLF STEEL LTD	OD52NG8	Free-standing Stove	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	50.8	14,000 - 20,000
WOLF STEEL LTD	OD52NGV-1	Free-standing Stove	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	61.3	17,000 - 25,000
WOLF STEEL LTD	OD560-1NG8	Free-standing Stove	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	60.6	11,000 - 18,000
WOLF STEEL LTD	OD56NTR-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	50.3	16,000 - 25,000
WOLF STEEL LTD	OD56NTE	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	51.8	21,000 - 31,000
WOLF STEEL LTD	HD35NT-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	61.3	17,500 - 25,000
WOLF STEEL LTD	HD40NT-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	62.4	18,800 - 27,000
WOLF STEEL LTD	HD48NT-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	64.1	21,000 - 30,000
WOLF STEEL LTD	HD81NT-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	58.5	21,000 - 60,000
WOLF STEEL LTD	HD835NT	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	58.5	25,000 - 36,000
WOLF STEEL LTD	HD840NT-2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	3 years	56.5	26,000 - 40,000
WOLF STEEL LTD	HD832NT-2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	37.3	36,500 - 55,000
WOLF STEEL LTD	IK30N58	Fireplace Insert	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	65	15,000 - 24,000
WOLF STEEL LTD	IK36-158	Fireplace Insert	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	65	15,000 - 24,000
WOLF STEEL LTD	L38N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	35.7	18,000 - 24,000
WOLF STEEL LTD	L38N2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	35.7	18,000 - 24,000
WOLF STEEL LTD	L38N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	43.9	25,000 - 30,000
WOLF STEEL LTD	L50N2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	43.9	25,000 - 30,000
WOLF STEEL LTD	LHD45N58	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	56.3	24,000
WOLF STEEL LTD	LHD62N58	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	65.2	37,000 - 50,000
WOLF STEEL LTD	LV38N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	50.4	20,000 - 30,000
WOLF STEEL LTD	LV38N-2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	37.8	21,000 - 30,000
WOLF STEEL LTD	LV38N2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	37.8	20,000 - 30,000
WOLF STEEL LTD	LV38N2-2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	37.8	21,000 - 30,000
WOLF STEEL LTD	LV50N-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	44.9	26,000 - 40,000
WOLF STEEL LTD	LV50N-2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	44.9	25,000 - 30,000
WOLF STEEL LTD	LV50N2-1	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	2 years	44.9	26,000 - 40,000
WOLF STEEL LTD	LV50N2-2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	44.9	25,000 - 30,000
WOLF STEEL LTD	LV62N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	51.4	29,000 - 62,000
WOLF STEEL LTD	LV62N2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	51.4	29,000 - 62,000
WOLF STEEL LTD	LV74N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	51.6	30,000 - 48,000
WOLF STEEL LTD	LVX38N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	39.1	22,000 - 32,000
WOLF STEEL LTD	LVX50N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	44.3	26,000 - 38,000
WOLF STEEL LTD	LVX50N2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	44.3	26,000 - 38,000
WOLF STEEL LTD	LVX62N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	46.9	32,000 - 44,000
WOLF STEEL LTD	LVX62N2	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	46.9	32,000 - 44,000
WOLF STEEL LTD	LVX74N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	51.6	35,000 - 50,000
WOLF STEEL LTD	WHD51N58	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	65.2	16,000 - 20,000
WOLF STEEL LTD	WHD48N	Fireplace	ANSI Z21.50	Direct Vent	Pilot on Demand	1 year	68.7	19,000 - 29,000
WOLF STEEL LTD	XJN58	Fireplace Insert	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	67	11,000 - 31,000
WOLF STEEL LTD	XJN4N-158	Fireplace Insert	ANSI Z21.50	Direct Vent	Pilot on Demand	4 years	68.1	13,000 - 40,000

## CONTACT US

24 Napoleon Road  
Barrie, Ontario, Canada  
L4M 0G8  
705-721-1212

214 Bayview Drive  
Barrie, Ontario, Canada  
L4N 4Y8  
705 726-4278

103 Miller Drive  
Crittenden, Kentucky, USA  
41030  
859 428-9555