

DOCKETED

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HPBA Comments 2019 Residential Compliance Manual Updates

Additional submitted attachment is included below.



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To: California Energy Commission - Docket No. 18-BSTD-02

RE: 2019 Residential Compliance Manual Updates

The Hearth Patio & Barbecue Association (HPBA) supports the California Energy Commission (CEC) and its efforts to reduce energy use in residential construction. HPBA believes that hearth products, such as direct vent gas fireplaces or wood heaters, are a means of reducing the energy use in new and existing homes.

Accordingly, HPBA offers the following suggestions to the proposed changes of the CEC's 2019 Residential Compliance Manual.

Chapter 3:

- Section 3.4.2.2 Fireplaces, Decorative Gas Appliances, and Gas Logs (Section 3.6.1.13 in 2016 Residential Manual):

HPBA suggests retaining the existing section as seen in the 2016 edition, including Figure 3-12.

Rationale: This section provides an instructional benefit to contractors, installers, building inspectors and other concerned parties, as well as helping to maintain installation safety.

- HPBA requests that existing Examples 3-17 and 3-18 (2016 Residential Manual) are kept (renumbered as necessary), but with following edits:

- “Example 3-17

Question:

A building plan specifies a ~~freestanding gas heater~~ decorative gas appliance, ~~that is decorative; however, the equipment is vented and is rated as a room heater.~~ Is it acceptable that this appliance have a pilot light?

Answer:

~~Yes. Since this equipment is rated as a room heater, it can have a continuous burning pilot light.~~ Yes, but only an On-Demand or Intermittent Pilot Light is allowed, as specified in ANSI Z21.20. Continuous Pilot Lights are prohibited.”



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Rationale: The edit helps to clarify the type of appliance encountered, and allows for alternatives to Continuous Pilot lights. The distinction between continuous pilots and their permissible alternatives should be included in the Residential Manual, as the alternatives reduce energy use without sacrificing safety or functionality.

- “Example 3-18

Question:

Do decorative gas appliances need glass or metal doors?

Answer:

Yes, the door requirement applies to masonry or factory-built fireplaces only. If a decorative gas appliance is installed inside a fireplace, the fireplace needs doors. Consult with the manufacturer of the decorative gas appliance regarding combustion air requirements. Doors must be installed in accordance with the appliance listing and the manufacturer’s installation instructions.”

Rationale: The change is to help ensure health and safety through proper installation. Factory-built fireplaces are tested and listed to specific standards. Any doors on a fireplace must comply with the conditions of the appliance listing and the manufacturer’s instructions to achieve a safe installation. Otherwise, a potential fire hazard is created.

Chapter 4:

- Section 4.2.1.2 Heating System Controls

In the second paragraph, HPBA requests that “decorative gas appliances” is reinstated to the list of appliances that do not require thermostats.

Rationale: Decorative appliances do not function with a thermostat, so therefore it is appropriate for them to be included in this list. Additionally, by keeping decorative gas appliances here, this section remains consistent with the list of appliances in Section 4.5 Controls.

- Example 4-4:

In Example 4-4, HPBA requests the addition of a standard that specifically measures gas fireplace efficiency, CAN/CSA-P.4 Testing Method for Measuring Annual Fireplace Efficiency. The proposed edit would read:

“Example 4-4



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Question:

How do I model the energy efficiency of a gas-vented fireplace for zonal control heating?

Answer:

To be used for heating, the appliance must have a rated annual fuel utilization efficiency (AFUE) or fireplace efficiency (FE). The appliance must be certified to the Energy Commission with an AFUE calculated by the manufacturer per the ANSI Z21.88-2009 Standard or an FE using the CAN/CSA-P.4.1 Testing Method for Measuring Annual Fireplace Efficiency. Gas-vented fireplaces must meet all the other relevant requirements of zonal control.”

Rationale: The CAN/CSA-P.4.1 standard is the industry standard for measuring annual fireplace efficiency.

- Section 4.7.7 Gas Appliances:

In the second paragraph, HPBA would like to add “continuous” to pilot light to clarify what is prohibited. The paragraph would read:

“Household cooking appliances are also prohibited from having a continuous pilot light unless there is no electrical supply voltage connection and each pilot consumes less than 150 Btu/h.”

Rationale: HPBA acknowledges that while continuous pilot lights, as defined in ANSI Z21.20, are being prohibited, there are other types of pilot lights available including On-Demand and Intermittent, both of which save energy while still maintaining safety and functionality. This should be reflected in the Residential Compliance Manual.

Joint Appendix JA1

- The HPBA would like to offer following to be included in Definitions:

PILOT LIGHT is a small gas burner used to light a larger burner when needed. Pilot lights are available in multiple varieties including On-Demand, Intermittent, and Continuous. On-Demand pilot lights automatically time out if the main burner is not placed in operation for a predetermined period of time. Intermittent pilot lights are on during, and for a brief period before, main burner ignition. Continuous pilot lights are always on (unless manually extinguished), ready to ignite the main burner when needed.



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Rationale: Currently, there is no definition for a pilot light, or any variation of the technology, either in the Residential Manual, the Joint Appendices, or the Building Energy Efficiency Standards. As described previously, there are multiple types of pilot lights, and while continuous pilot lights are being prohibited, other types should be allowed.

Summary:

HPBA's intent is to work with the CEC and to help clarify sections of the code relating to hearth products. We hope the Commission will sincerely review these proposed edits and expect the Commission will find them to be in everyone's best interest. HPBA looks forward to working with the CEC to help implement these changes.

Thank you for your consideration,

Ryan Carroll
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