

RYAN BROS. CHIMNEY SWEEPING, INC.

*Quality, Professional Service*

Ca. Contractor's License #566893

August 2, 2011

California Energy Commission  
Dockets Office, MS-4  
RE: Docket No. 10-BSTD-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

<b>DOCKET</b>	
<b>10-BSTD-01</b>	
DATE	<u>AUG 02 2011</u>
RECD.	<u>AUG 02 2011</u>

Dear Mazi Shirakh,

My name is Amie Ryan and I am writing to you on behalf of Ryan Bros. Chimney Sweeping, Inc. located in Sacramento. We are a family owned and operated business and have been serving Sacramento and Placer Counties for the last 33 years. While I appreciate the work the CEC is doing to increase the energy efficient of the Building Energy Efficiency Standard (T-24, Part 6) and meet AB32 goals, I am concerned with the effect it will have on our business and businesses like it.

For the purposes of these comments, I am not addressing wood burning, decorative gas fireplaces or other products, but only with vented gas heating fireplaces, regulated both by DOE under the NAECA Standards, and, listed by the CEC under the appliance efficiency standard as Direct Heating Appliances. We have worked very closely with the Sacramento Metropolitan Air Quality Management District on change-outs in the greater Sacramento area promoting the installation of gas heating appliances. Along with several retailers in the Sacramento area, since 2005 over 2,200 heating gas appliances have been installed. These appliances are central to the pollution reduction strategy of this air district as many old homeowners will not replace their old wood burning heaters without a zone heating alternative. Vented gas inserts are critical for this program.

I request that the Standards maintain the residential zone credit for heating, also known as the two-zone modeling credit, outline in section 4.5.2 of the Residential ACM. The Sacramento Metropolitan Air Quality Management District encourages the use of our heating products in this two-zone application. Many of our customers use these types of products to reduce their gas usage.

Thank you for your time and attention to this matter. If you have any questions, please call me at the office.

Sincerely,

Amie Ryan  
General Manager

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

