

M&G DuraVent, Inc.

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August 1, 2011

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

RE: Building Energy Efficiency and Residential Zone Heating Credits

Dear Mr. Mazi Shirakh:

I am writing to you regarding the proposed developments in the CEC's Title 24 Building Energy Efficiency standard. M&G DuraVent supports the direction of CEC towards improving overall building efficiency. However, we are concerned about the real-world accuracy of the model to determine efficiency and how it pertains to actual use of vented heating appliances.

Founded in California in 1958, DuraVent has been a leading manufacturer of Gas Vent and Chimney products in the U.S. Over that time we built our reputation as the industry's venting leader offering innovative, safe, and professional products for the HVAC and Hearth markets. Recently in late 2010, we became M&G DuraVent with the acquisition by the M&G Group, an international venting group and manufacturer serving Europe and the U.S., with DuraVent being the single largest division of the Group. As a California-based company, DuraVent has kept its headquarters for nearly 30 years in Vacaville, California.

M&G DuraVent employs 320 people and our venting products are sold to nearly 900 distributors and wholesalers throughout the U.S. and Canada. The majority of our venting products are used with condensing and non-condensing gas-burning appliances, both natural draft and positive pressure. Most of our products are installed in new home construction, but we also cater to remodels and existing homes as well. While some of our products are used in commercial applications, the biggest segment of our market is in residential installations. M&G DuraVent remains active in the industry and has been a member of the Hearth, Patio, & Barbeque Association (HPBA) since the association's inception, 25 years ago.

M&G DuraVent requests that the residential zone credit for heating as described in section 4.5.2 of the Residential ACM will be retained within the Building Energy Efficiency standard. At M&G DuraVent, we feel that not only is zone heating more energy efficient than that of central heating, but also reflects a more accurate energy usage for a large percentage of homes.

DOCKET
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Gas fireplaces and gas stove heaters are among the most requested accessories in new home construction. These appliances operate as zone heaters which will heat the living spaces, while leaving the sleeping rooms and other unoccupied rooms to cool off, facilitating an overall decrease in gas consumption. On the other hand, a central heating system essentially requires that all rooms are heated equivalently, thereby using more gas and decreasing energy efficiency than a zone heating model. While not every home has a fireplace or stove heater, those homes that do will use these appliances to heat their home, creating the zone heating described.

In addition, we believe that cooling and heating zones should be considered separately. The heating and cooling energy loads for a home are different, as are their respective equipment in many cases. The energy usage of the cooling and heating equipment are also different, even more so for homes that employ zone cooling or zone heating.

A removal of the zone credit for heating would have a serious impact on our company. If the zone credit is removed, sales for vented gas-heating appliance would greatly be reduced due to their cost increase. The hearth appliance industry would be negatively impacted and our company in-turn would likely suffer a 30% reduction in our labor force.

I appreciate your time in reviewing our concerns, and urge you to retain the zone credit for residential heating in the Building Energy Efficiency standard. The zone heating credit reflects a more realistic usage of homeowners' appliances, and helps to promote overall building efficiency. If there are any questions that I can answer, please feel free to contact me.

Sincerely,



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CC: Chair Robert Weisenmiller, Ph.D.
Commissioner Karen Douglas
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