

July 29, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512
By email to: [docket@energy.state.ca.us]

DOCKET	
10-BSTD-01	
DATE	JUL 29 2011
RECD.	JUL 29 2011

Dear Mazi Shirakh;

Our company imports and distributes hearth products, both decorative and high efficiency, to over 200 retailers and contractors in California. We have been growing our business in this state for over 10 years. Our California warehouses and offices are located in Sacramento where we employ 11 full time staff. We appreciate the focus of the CEC in their efforts to increase the energy efficiency of the Building Energy Efficiency Standards relative to T-24, Part 6 and to meet the AB 32 goals.

With regard to the CEC work on the aforementioned standards I am particularly interested in the treatment of our vented gas heating products which are regulated by both the DOE under NAECA Standards and the CEC under the appliance efficiency standards as Direct Heating Appliances.

AES requests that the Standards maintain the residential zone credit for heating as a two zone model as outlined in section 4.5.2 of the residential ACM and further that the two zone model be included in the design, development and final software that will be used to measure compliance.

Many of our customers serve areas of California where heating in general and back up heat in particular are of particular concern to homeowners and their families. In many of these areas the needs and concern for heat are entirely separate from those of cooling with regard to the residence and our duct free high efficiency product is a very cost effective, environmentally friendly and reliable source of heat.

Sincerely,



Kirk Newby
President

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