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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]

<b>DOCKET</b>	
<b>10-BSTD-01</b>	
DATE	_____
RECD.	JUL 29 2011

Dear Mazi Sharikh;

This letter follows my comments at the July 15 workshop regarding the possible alteration, or elimination, of the credit for zonal space conditioning in the next version of the Residential Energy Codes. We appreciate the effort that the staff is putting into the increasingly complex and difficult code changes needed to help meet the goals of AB 32. We also appreciate the need to review field practice, and address any possible misapplication of credits in the construction or alteration of California homes.

As I stated at the workshop, the Hearth, Patio & Barbecue Association (HPBA) is the North American trade association for products associated with the Hearth, or Fireplace. For the last 10-15 years, this has included vented gas room heaters which are often used in place of, or to replace, older wood heating devices. In new construction, our direct vented room heaters are used in place of wood burning appliances in air districts within this state which prohibit traditional fireplaces and in zones of our state that welcome supplemental heating. We represent over 95% of the vented heating fireplaces in this state and the companys that make venting and other parts for them. We have a local organization, the HPBA Pacific, which represents distributors, installers and retailers who will also file comments.

We have no position on the proposal to alter or remove the credit for zone cooling, but we are very concerned that the next code, as well as the software that supports it, include a credit for zone heating. We are aware that this credit is useful in some coastal zones now and we anticipate that the extension of the Netzero mandate into the stock of existing homes may substantially increase the usefulness of this option.

We currently work closely with several air districts that are offering monetary incentives for the replacement of old woodstoves and air tight fireplace inserts with cleaner alternatives and particularly with vented gas heaters. Particularly in existing ranch style California homes, often with only one or two older occupants, this type of duct-less direct heating is increasingly popular and a welcome replacement for an older fireplace insert (which was, at the time of purchase, a method of zone heating). We would anticipate that these air districts will be increasingly interested in the confluence of the energy code and the need to reduce residential wood burning in existing suburbs.

Clearly, our industry has some work to do to validate our assertions regarding energy efficiency and we intend to do that during the next cycle. Our concern in this cycle is that the ability to model multiple living area zones must be in the new software in order to accurately quantify and model the energy savings.

We hope the CEC will retain the credit for zone heating, in the next version of the Building Energy Efficiency standards (T-24, Part 6). We will be happy to answer any questions you or your staff may have about these products.

John Crouch  
Director of Public Affairs  
HPBA

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