

The Jones Company RECD.

10-BSTD-01

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Memo mail from Bob Jones

8/8/2011

August 1, 2011

Attention: Mr. Shirakh **CALIFORNIA ENERGY COMMISSION** Dockets Office, MS-4 Re: Docket No. 10-BSTD-01 1516 Ninth Street Sacramento, CA 98814-5512 Email: <u>docket@energy.state.ca.us</u>

Dear Mr. Shirakh:

My name is Bob Jones, and I live in the Sacramento area. My business, The Jones Company, maintains a warehouse in Northern California from which we ship vented direct heating product to hundreds of dealers, specialty hearth shops, HVAC, and big-box retailers. We have been marketing and selling these vented heater items in California for over twenty-five years. We've also been active with HPBA for many, many years.

One of the companies we represent is Empire Comfort Systems. Empire is a manufacturer of direct heating equipment (zone heating) and has been a direct heating manufacturer for almost eighty years. In addition to Empire Comfort Systems we represent other heating and air conditioning companies sold and used in California, including air conditioning coils, zone air conditioning, packaged school air conditioning and heatpumps, among others.

These vented zone heater products are regulated and listed by the DOE under NAECA Standards and the CEC under the appliance efficiency standards as Direct Heating Equipment.

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We value the effort of the CEC to raise the energy efficiency of the Building Energy Efficiency Standards (T-24, Part 6) to meet AB32 goals. We would appreciate the continued ability to model two zones in the compliance software. Heating in two zones (living and sleeping, traditionally) is a very common practice for our consumers. This practice is very energy efficient, since only the room being used is heated, thus not wasting energy by heating empty rooms. The Southcoast Air Quality Management District is encouraging the use of Vented Direct Heating Hearth Products in an effort to improve air quality, and we believe the regulated energy efficiency allows consumers to maximize their energy use. There is no duct loss with these products, which makes these products a desirable energy efficient alternative for living spaces.

We are requesting that the Standards maintain the residential zone credit for heating also known as the Two-Zone Modeling Credit, outlined in section 4.5.2 of the Residential ACM.

Thank you for your consideration.

Respectfully,

THE JONES COMPANY

Robert E. Jones, President

CC: <u>pbarthol@energy.state.ca.us</u>, <u>bwilcox@lmi.net</u>, <u>ccross@energy.ca.us</u>, <u>cgraber@energy.ca.us</u>