



DOCKET
10-BSTD-01
DATE _____
RECD. <u>AUG 03 2011</u>

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]

Dear Mazi Sharikh;

The HPBA Pacific-Hearth, Patio, & Barbeque Association, Pacific Affiliate- represents Hearth, Fireplace Dealers in the state of California. HPBA Pacific has been around for nearly 20 years. With over 170 members that employ more than 1200 California residents, we understand the relevance and importance of creating energy efficient product and saving consumers money on utilities. We appreciate the work the CEC is doing to increase Efficiency Standards, title 24 part 6, and to meet AB 32 goals.

With this comment, HPBA Pacific is only addressing vented, gas heating fireplaces, regulated by the DOE under the NAECA Standards, and the CEC under the appliance efficiency standards as Direct Heating Appliances.

As the California representative of Fireplace Retailers and Dealers in this state, we are asking 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. Zone heating makes sense in that heating where the consumer is in the home is much more energy efficient than turning on a whole house heating system. Members throughout the state understand this concept and have sold consumers who also believe in this for many years. The ability to model two zones must remain in the compliance software. Cooling and heating are two different subjects and must not be intertwined with each other.

Many air districts throughout the state encourage the use of heating products that promote this two-zone model. Over the past 10 years, we have worked closely with California Air Districts to educate and advise them on hearth products and the benefits to using these models.

Thank you.

Pat Rosengren
HBPA Pacific
Executive Director
Artfulpat@aol.com
626-237-1200