

# DOCKET

10-BSTD-01

DATE \_\_\_\_\_

RECD. AUG 05 2011

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

Dear Mazi Shirakh;

Masonry Fireplace Industries, LLC manufactures modular masonry concrete fireplaces in Southern California. We employ 12 people in our facilities in Santa Ana, CA and Highland, CA. We appreciate the work the California Energy Commission is doing to increase efficiency of the Building Energy Efficiency Standards (T-24, Part 6) and to meet AB 32 goals.

I am a member of the Hearth, Patio and Barbeque Association, the national trade association that represents fireplaces and barbecues that are manufactured and installed in California. I also sit on the board of the HPBA Pacific, an affiliate of the HPBA representing the interests of its California members. The hearth products business represents some 1,200 employees that work for manufacturers, distributors and dealers state wide that depend on installation of approximately tens of thousands of fireplaces in the state of California.

For the intent of this comment, I am focusing only on vented gas heating fireplaces, regulated by both DOE under the NAECA Standards, and the CEC under the appliance efficiency standards as Direct Heating Appliances.

On behalf of Masonry Fireplace Industries, I request that 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. We are particularly concerned that the ability to model two zones remains in the compliance software. Cooling and heating should not be considered the same. Heating by living and sleeping zones is behaviorally common. The South Coast Air Quality Management District encourages the use of our heating products in this two-zone application.

Sincerely,

Bill Harris  
Managing Partner  
(949) 292-6512

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