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]

DOCKET10-BSTD-01

DATE AUG 05 2011

RECD. AUG 05 2011

Dear Mazi Shirakh;

My name is Russell Savard, owner of Rainbow Pellet Hearth & Home in Redding, CA. I have an established fireplace business that has been around for 21 years. We have 6 full time employees.

The trade organization I belong to, HPBA – Hearth Patio & BBQ Association- represents over 90% of fireplaces, and barbecues installed in California. HPBA has continued interest in helping members manufacture, promote and install efficient, innovative products. Over the past twenty-five years, our technology of these efficient products has come a long way.

I certainly understand and can appreciate the work that the CEC is doing to increase the energy efficiency of the Building Energy Efficiency Standards (T-24, Part 6) and meet AB 32 goals. For the purpose of this comment I am not addressing decorative items or other products, but only vented gas heating fireplaces, regulated by both DOE under the NAECA Standards, and the CEC under the appliance efficiency standards as Direct Heating Appliances.

Here is my appeal:

- 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.
- The ability to model two zones must remain in the software.
- Cooling and heating should be considered separately. Heating by living and sleeping zones is behaviorally common.
- The Shasta County Air Quality Management District encourages the use of our heating products in this two-zone application.

It's important that consumers continue to have choices when making these types of purchases for their homes. The two-zone model is easily understood by my clients and makes sense from an efficiency point of view and in many cases, financially for the homeowner. Taking this option away would not be good for my business.

Sincerely,

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Russell Savard - Owner

Rainbow Pellet Hearth & Home 20181 Charlanne Dr. Redding, Ca, 96002 530.223.6833

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