

**BEFORE THE
OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY
UNITED STATES DEPARTMENT OF ENERGY
WASHINGTON, DC**

Energy Conservation Program
For Consumer Products: Energy
Conservation Standards for
Residential Water Heaters, Direct
Heating Equipment and Pool Heaters
Framework Document

Notice of Proposed Rulemaking
Docket No. EE-2006-STD-0129
RIN Number 1904-AA90

Sent: February 13, 2007

COMMENTS OF THE HEARTH, PATIO & BARBECUE ASSOCIATION

The Hearth, Patio & Barbecue Association, based in Arlington, VA, is the North American industry association for manufacturers, retailers, distributors, representatives, service firms and allied associates for all types of hearth, barbecue and patio appliances, fuels and accessories. The association provides professional member services and industry support in education, statistics, government relations, marketing, advertising and consumer education. There are more than 2,700 members in the HPBA.

Response to Item 1-4 DOE seeks comment in the recognition of vented hearth products as a part of the direct heating equipment rulemaking.

HPBA does not oppose the inclusion of hearth products in DOE proposed rulemaking for energy efficiency, provided that these products are defined very clearly (heater rated gas fireplaces, decorative gas fireplaces, free standing gas heaters and gas logs). Most importantly, hearth products should not be placed in the category of “direct heating equipment,” but in a category of their own. Further, as we discuss in these comments, not all hearth products are equivalent. DOE must take this into consideration.

The hearth products category should include two classes of products: heater rated gas fireplaces and free standing gas heaters. The manufacturers of these two classes are already tested to ANSI standards (ANSI Z21.58) and have AFUE numbers on all of the products in the categories that are mentioned in the DOE Framework (i.e., the appliance has a thermostat, the manufacturer markets the product as a space-heating device or the manufacturer literature includes a description of the appliance’s efficiency, energy use or heating function). Free standing gas heaters (vented room heaters) are tested to those standards, although they may not have blowers, but they typically have thermostats and their primary function is for space heating. Log sets do not fit within these guidelines and typically would be seen as a decorative product and not a heating product. HPBA will gladly work with DOE in defining all of these products to arrive at an appropriate and equitable standard.

It is essential that efficiency ratings for these two classes of product (i.e., gas fireplaces and free standing gas heaters) be developed independently. HPBA research shows that gas fireplaces are typically an aesthetic product, judged by how closely the flame mimics that of a wood fire. Yellow flame is the goal and thus is typically lower in efficiency (blue flame is a more efficient flame). Most consumers (70%) buy fireplaces because they look good; the remainder buy fireplaces because they will save money on their heating bill. On the other hand, only 21% if the freestanding stove users felt the same way as fireplace users. Thus, even though heater rated gas fireplaces may be slightly less efficient than free standing gas stoves, the intermittent use pattern for fireplaces (less frequent usage for shorter durations) supports the development of a less stringent requirement for fireplaces when compared to free standing gas heaters. Thus, we feel that the standards for these two products be developed independently.

HPBA is prepared to discuss these issues in detail and will be glad to participate with stakeholders in the rulemaking process.

Respectfully submitted,

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