

From: Nick O'Neil <noneil@energy350.com>
Sent: Monday, September 23, 2019 3:54 PM
To: DES SBCC <sbcc@des.wa.gov>
Subject: Testimony on the adoption of the 2018 WSEC-Residential

Hello, below please find my public comment on 19-WSEC-R28, (Pilot Lights) which I was the proponent for.

Public comment on proposal 19-WSEC-R28

I would like to propose adding a definition to section R202 to make clear what is considered a “continuous” pilot light. This definition is in line with similar language used in British Columbia for their pilot light prohibition standard. This is not intended to change the scope or intent of the original proposal, but simply to reduce possible confusion for code officials on what is considered a continuous pilot light. The proposed definition is below:

R202 Continuously Burning Pilot Light

A small gas flame used to ignite gas at a larger burner. Once lit, a continuous pilot light remains in operation until manually interrupted. Pilot light ignition systems with the ability to switch between intermittent and continuous mode are considered continuous. Automatic gas ignition systems defined as per ANSI Z21.20 are not considered continuous.

Thank you,
Nick O'Neil

Nicholas O'Neil, P.E.
Director of Research & Evaluation
Energy 350
Direct: (503) 333-8161 | Office: (971) 544-7211
www.energy350.com