

From: Nick O'Neil <noneil@energy350.com>
Sent: Thursday, September 26, 2019 6:53 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-R27, (Gas Fireplace Efficiency) which I was the proponent for.

Public comment on proposal 19-WSEC-R27

I propose to modify the language as shown below. New text added is highlighted red, original proposal text is blue, and text to be removed is blue with ~~strikeout~~.

R402.4.2.1 Gas Fireplace Efficiency. All natural-gas fireplaces designed to heat indoor space and/or provide aesthetic appeal (decorative) shall be listed and labeled with a fireplace efficiency (FE) rating of 65% or greater in accordance with CSA P.4.1-15. ~~Vented Gas Fireplace Heaters certified to ANSI Z21.88 shall achieve a 65% FE or greater. Vented Gas Fireplaces certified to ANSI Z21.50 shall achieve a 30% FE or greater.~~

Exception: Gas fireplaces that have a rated output < 9,000 btu/h.

This proposed revision removes the version date (which does not typically appear in the WSEC code body) and adds a clarifying distinction between vented gas heaters which are rated to one ANSI standard, and decorative fireplaces which are rated to another. This distinction does not change the original intent of the proposal to regulate both vented and decorative fireplaces, but after further conversations with the industry, the California Energy Commission, and the BC Ministry of Mines, it was deemed important to make.

After further consideration and listening to testimony at the public hearing in Spokane we propose a modification to the decorative hearth efficiency level. We propose setting the FE level of decorative hearths at 30%. At this level the worst performers are eliminated from the market but a significant number of decorative hearths can still meet this efficiency threshold (Refer to Figures 1 & 2 below). This will allow a consumer to choose from a variety of efficient options and encourage market differentiation based upon efficiency. Voluntary programs could also be used to further encourage higher efficiency products. This fair and common-sense approach will allow hearth products to transition gradually to be more efficient products and be a part of the efficient future of Washington State.

This public comments seeks to distinguish between a vented heater and a decorative fireplace by establishing different efficiency level thresholds for each. Vented heaters remain at the proposed 65% FE which are supported in the market with an ample mix of models and manufacturers available. Decorative fireplace efficiency is set at 30% FE which will allow a significant number of fireplaces to qualify, but removes the extremely poor performers from the market and avoids disenfranchising the industry. In this way we are responding to the

industry's request to consider impacts on businesses by placing a significantly more obtainable threshold on decorative fireplaces that are in line with what is available in the market and offers efficient choices to consumers.

My position remains the same that efficient gas use, regardless of whether the fireplace is being used for decorative or heating purposes, should be regulated to aid Washington State with meeting its aggressive climate objectives.

Figure 1: Distribution of Fireplace Efficiency Score (FE) for unique Zero-Clearance Decorative fireplaces on the current Natural Resources Canada (NRCAN) list

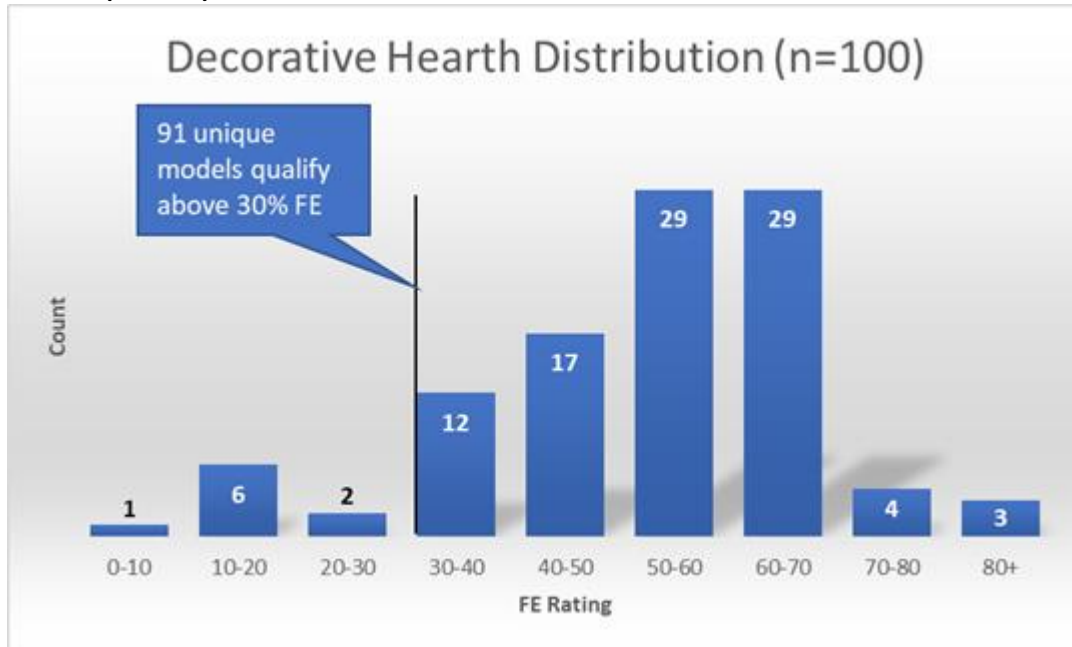
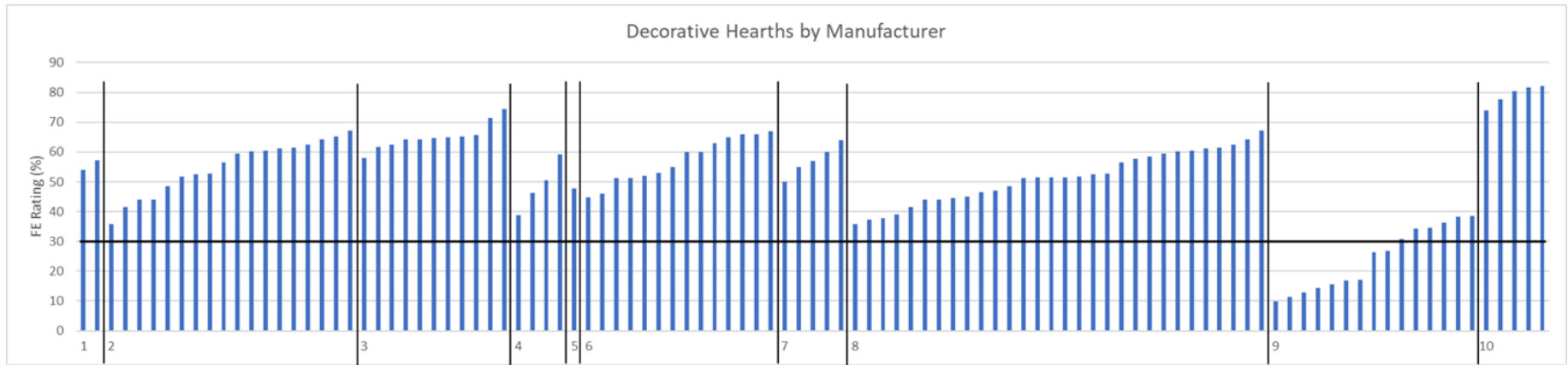


Figure 2: All unique Zero-Clearance Decorative Fireplaces on the current Natural Resources Canada (NRCAN) list by rating and manufacturer



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