

Appliance Standards Awareness Project
Alliance to Save Energy
American Council for an Energy-Efficient Economy
National Consumer Law Center
Natural Resources Defense Council
Northwest Energy Efficiency Alliance

May 11, 2015

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-5B
1000 Independence Avenue, SW
Washington, DC 20585

RE: Docket Number EERE–2014–BT–STD–0036/RIN 1904–AD35: Notice of Proposed Rulemaking for Energy Conservation Standards for Hearth Products

Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Alliance to Save Energy (ASE), American Council for an Energy-Efficient Economy (ACEEE), National Consumer Law Center (NCLC), Natural Resources Defense Council (NRDC), and Northwest Energy Efficiency Alliance (NEEA) on the notice of proposed rulemaking (NOPR) for energy conservation standards for hearth products. 80 Fed. Reg. 7082 (February 9, 2015). We appreciate the opportunity to provide input to the Department.

We support the proposed standard for hearth products. The proposed standard would eliminate standing pilot lights on hearth products, which are a significant energy waste. For hearth products with standing pilot lights, DOE estimates that on average the energy consumption of the standing pilot light represents 40% of the total annual energy consumption of the hearth product.¹ DOE estimates that the proposed standard would save consumers \$165 on average in life-cycle costs. On a national level, the proposed standard would save 0.69 quads of energy over 30 years of sales and net consumers \$1.0-3.1 billion in savings.²

At least one manufacturer has already developed a solution to the potential challenges associated with electronic ignition systems for gas log sets. At the public meeting on March 23, 2015, manufacturers stated that adding an electronic ignition system to gas log sets can take away from the aesthetic experience and that electronic ignition components are more heat sensitive than other ignition systems. However, according to Rasmussen, their *Valve Vanisher™* “addresses the three biggest issues regarding electronic ignition”: it “eliminates the ‘Big Ugly

¹ 80 Fed. Reg. 7089, Table III.1.

² 80 Fed. Reg. 7084.

Box””; “eliminates the off-centering or downsizing of the log set to accommodate the placement of the Big Ugly Box”; and “places the heat sensitive controls in a cooler zone.”³

There are gas log sets available today in a wide range of burner sizes that use electronic ignition. At the public meeting on March 23, 2015, manufacturers stated that electronic ignition system manufacturers do not make a product that works in larger gas log sets. However, it appears that gas log sets that use electronic ignition are available today in a wide range of burner sizes, including the largest burner sizes. For example, RH Peterson offers vented gas log sets with electronic ignition with burner sizes up to 60 inches, which is the maximum burner size they offer for that product type.⁴ And FMI Products offers vent-free gas log sets with electronic ignition with burner sizes up to 36 inches, which is the maximum burner size they offer for that product type.⁵

There are gas log sets with battery-powered electronic ignition available today with variable flame height capability. At the public meeting on March 23, 2015, manufacturers stated that eliminating standing pilots could result in gas log sets always being operated at the maximum flame height because many battery-powered electronic ignition systems do not allow for adjustable flames. However, it appears that multiple manufacturers offer gas log sets with battery-powered electronic ignition with variable flame height capability. For example, Empire Comfort Systems offers vent-free gas log sets with battery-powered electronic ignition with a variable flame height remote control.⁶ And Rasmussen’s electronic ignition *Valve Vanisher*TM is battery powered and allows for varying the flame height.⁷

There are multiple options other than standing pilot lights that allow for the ability to use a hearth product to provide heating during a power outage. At the public meeting on March 23, 2015, manufacturers stated that standing pilot lights provide a unique consumer utility of allowing for the ability to use a hearth product to provide heating during a power outage. However, we understand that electronic ignition systems with battery backup, battery-powered electronic ignition systems, match-lit systems, and piezo ignitors all provide this same consumer utility. For example, Heat & Glo’s IntelliFireTM electronic ignition systems “have battery backup systems that can be used to light the pilot during a power outage.”⁸ And Rasmussen states that their *Valve Vanisher*TM provides an “excellent source of emergency heat” as no electricity is required aside from batteries.⁹

We believe that any potential effect of the proposed standard on the total number of annual wood fires would be negligible. At the public meeting on March 23, 2015, manufacturers stated that the proposed standard for hearth products could discourage people from switching from burning wood to using gas logs because of the incremental cost of an electronic ignition system, which could have an impact on air quality. In the analysis for the NOPR, DOE accounted for the potential impact of the proposed standard on shipments of hearth products using a price

³ <http://rasmussengaslogs.com/valve-vanisher/>.

⁴ http://www.rhpeterson.com/images3/catalogs/RF_vented_catalog_2014.pdf. See pp. 30-31.

⁵ <http://www.fmiproducts.com/content/pdfs/FA2850-0912GasLogs.pdf>.

⁶ http://www.finesgas.com/cats/gas_logs/vent_free/empire/loft_burner.

⁷ <http://www.doctorflue.com/docs/rasmussen-vented-gas-log-brochure.pdf>, p. 4.


⁸ <http://www.heatnglo.com/Shopping-Tools/Blog/Using-Your-Fireplace-or-Stove-During-a-Power-Outage.aspx>.

⁹ <http://www.doctorflue.com/docs/rasmussen-vented-gas-log-brochure.pdf>.

elasticity.¹⁰ DOE estimates that cumulative shipments between 2021 and 2050 would decrease by less than 2% in the standards case relative to the base case.¹¹ Further, of the total non-match-lit hearth product shipments, DOE estimates that only 25% are gas logs.¹² In addition, we believe that the number of functioning wood-burning fireplaces that are used is likely to be fairly small, and that wood-burning fireplaces that are used are likely to be used significantly less frequently than gas hearth products. DOE notes in the NOPR that hearth products are often purchased for the convenience of natural gas as a fuel source as opposed to wood.¹³ We suspect that many homeowners who are considering converting from a wood-burning fireplace to gas logs are doing so because they live in an area where firewood is either inconvenient, not readily available, and/or expensive. And as Earthjustice noted at the public meeting, a gas hearth product can be turned on by pressing a button or flipping a switch while using a wood-burning fireplace involves stacking wood and building a fire.¹⁴ Therefore, we believe that any potential effect of the proposed standard on the total number of annual wood fires would be negligible.

Thank you for considering these comments.

Sincerely,



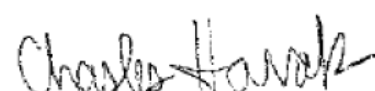
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¹⁰ 80 Fed. Reg. 7104.

¹¹ NOPR NIA spreadsheet; "Price_Elasticity" tab; rows 74 and 75. ID: EERE-2014-BT-STD-0036-0007.

¹² Technical Support Document. p. 9-3.

¹³ 80 Fed. Reg. 7104.

¹⁴ Public Meeting Transcript. pp. 330-31. ID: EERE-2014-BT-STD-0036-0025.