

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Natural Resources Defense Council
Northwest Energy Efficiency Alliance
New Buildings Institute

July 14, 2022

Ms. Julia Hegarty
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW, Washington, DC 20585

RE: Docket Number EERE-2022-BT-STD-0017: Request for Information on Energy Conservation Standards for Miscellaneous Gas Products

Dear Ms. Hegarty:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), the American Council for an Energy-Efficient Economy (ACEEE), the Natural Resources Defense Council (NRDC), the Northwest Energy Efficiency Alliance, and the New Buildings Institute (NBI) on the request for information (RFI) for energy conservation standards for miscellaneous gas products (MGP). 87 Fed. Reg. 35925 (June 14, 2022). We appreciate the opportunity to provide input to the Department.

We support establishing a prescriptive requirement for decorative hearth products. In the RFI, DOE states that the Department is considering whether a prescriptive design requirement would be appropriate for miscellaneous gas products (MGP). We support a requirement disallowing continuous (standing) pilot lights for decorative hearth products. Standing pilot lights use a considerable portion of the total energy consumed by this equipment. DOE estimated in the February 2022 notice of proposed determination (NOPD) that ignition energy accounts for 64% of the average annual household energy use of decorative hearth products of 1,230 kWh (with the remaining 36% from main burner energy use).¹ The 2017 LBNL hearth survey showed that the operating hours of a standing pilot light are significant—4,919 for “decorative” and 3,500 for “mostly decorative” products, representing 56% and 40% of total annual hours, respectively.² For a significant portion of those hours, the standing pilot light is not providing useful heat (and may contribute to the cooling season cooling load). Eliminating this source of waste heat therefore represents a significant opportunity for energy savings. A prescriptive requirement would be similar to standards in Canada and in multiple U.S. states for decorative hearth products.

Additionally, as part of a potential prescriptive requirement, we encourage DOE to consider limiting on-demand pilot lights from burning continuously for more than a set amount of time. On-demand pilot lights have the potential to use much more energy than intermittent³ pilot lights because they remain on for a predetermined period of time, and if the main burner is operated within that time period, the clock

¹ <https://www.regulations.gov/document/EERE-2021-BT-DET-0034-0001>. p. 6791.

² <https://eta.lbl.gov/publications/survey-hearth-products-us-homes>. p. 54.

³ Intermittent systems, where the pilot is lit using an electric starter only when there is a need for a flame.

resets. Such a requirement for on-demand pilot lights could achieve additional energy savings and would be similar to requirements set forth by NRCAN in standards for decorative gas fireplaces.⁴

We encourage DOE to consider setting a performance-based standard for outdoor heaters. Outdoor heaters, by definition, provide heat proximate to the unit. We believe that DOE intended to categorize this equipment as heating equipment within the scope of miscellaneous gas products, as heating is the primary function—with no reference to aesthetics appearing in DOE’s proposed definition. However, in this RFI, DOE states that “the aesthetic nature of many outdoor heaters is an important part of the value they provide, with some designs featuring a prominent flame (although others have little or no visible flame).”⁵ We recognize that some portion of the outdoor heater market includes a visible flame that provides aesthetic value. However, DOE could consider the impact of a visible flame on the measured efficiency as part of the consideration of potential performance-based standards for outdoor heaters.

We encourage DOE to provide additional clarity to distinguish decorative hearth products from hearth heaters. As DOE works towards developing standards for MGP and hearth heaters (a category of direct heating equipment), we are concerned that the proposed definitions in the February 2022 MGP NOPD and this RFI may have the potential to allow products that are actually heating products to be categorized as MGP. We encourage DOE to ensure that the definitions would not allow for heating products on the market today to simply be reclassified as decorative hearth products.

Thank you for considering these comments.

Sincerely,



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<https://www.nrcan.gc.ca/energy-efficiency/energy-efficiency-regulations/guide-canadas-energy-efficiency-regulations/gas-fireplaces/6865>

⁵ <https://www.regulations.gov/document/EERE-2022-BT-STD-0017-0001>. p. 35929.