



Meeting Summary

Docket ID No. EERE-2014-BT-STD-0036-0023
RIN 1904-AD35

On June 16, 2016, representatives of the Hearth, Patio & Barbecue Association (HPBA) met with Department of Energy (DOE) officials to discuss issues related to DOE's proposed energy conservation standard for "hearth products" published at 80 Fed. Reg. 7082 (February 9, 2015).

The meeting was attended by the following individuals:

John Cymbalsky, DOE Office of Energy Efficiency and Renewable Energy
Daniel Cohen, DOE Office of the General Counsel
Jack Goldman, President & CEO of HPBA
Ryan Carroll, Director – Government Affairs, HPBA
Rachel Feinstein, Manager – Government Affairs, HPBA
Barton Day, Law Offices of Barton Day PLLC, as counsel for HPBA

The topics discussed are summarized below.

1. Continuous pilots on vented gas fireplaces, fireplace inserts, and freestanding stoves

HPBA reported that is implementing measures to accelerate the existing trend away from the use of continuous pilots in newly-manufactured vented gas fireplaces, fireplace inserts, and freestanding gas stoves. This initiative has been publicly announced through a press release available on HPBA's web site at:

<http://www.hpba.org/media/news/hpba-takes-steps-to-conserve-energy-in-newly-manufactured-gas-appliances>

Specifically, HPBA is pursuing amendments to the ANSI certification standards for this entire range of products (*i.e.*, the ANSI Z21.50 and Z21.88 standards) that would make elimination of the use of continuous pilots in such products mandatory.

HPBA has already had preliminary discussions with the CSA Group – the international standards organization responsible for the ANSI Z21.50 and Z21.88 standards – to explore the possibility of amending the standards for this purpose. Those discussions led to HPBA's submission of a formal Request for Change on May 19, 2016 and discussion of that Request for Change at a CSA meeting held in Cleveland, Ohio, on June 2, 2016. As a result of that meeting, CSA set up a Task Force, chaired by HPBA's Ryan Carroll, to review both standards (collectively over 200 pages long) to identify all of the specific technical changes that will be necessary to eliminate the use of continuous pilots in products certified to those standards. Given the normal standards amendment process, HPBA expects that – by a target date of mid-2019 – all newly-manufactured vented gas fireplaces, fireplace inserts, and



freestanding stoves will be required to be certified to amended standards precluding the use of continuous pilots.

2. Continuous pilots on outdoor products

HPBA reported that its Energy Conservation Task Force has been considering whether a similar standard amendment would be appropriate to eliminate the use of continuous pilots in outdoor products certified to the ANSI Z21.97 (decorative outdoor gas appliance) standard.

After further investigation, HPBA continues to believe that elimination of continuous pilots in such products would not provide any significant energy conservation benefits. This conclusion is based on two principal considerations. First, most products certified to the ANSI Z21.97 standard operate off small propane cylinders, and consumers understand that such products should be turned off – and that the valves on the propane cylinders supplying such products should also be closed – when the products are not in use. Second, it still appears that very few products certified to the ANSI Z21.97 standard have continuous pilots, and that the pilots used on such products are not intended to be left burning after a product’s main burners are off.

Earlier this year, HPBA did confirm that there are at least some products certified to the ANSI Z21.97 standard that use a “continuous pilots” for safety purposes: specifically, to eliminate the need for direct main burner ignition (thus limiting the amount of gas initially ignited when the product is turned on). These pilots technically meet the definition of a “continuous pilot” because they remain ignited until they are manually extinguished. However these pilots are only intended to be used as part of the main burner ignition sequence, and are intended to be turned off when the product’s main burners are turned off. As a result, HPBA does not believe that elimination of these pilots would provide any significant energy conservation benefits. More importantly, HPBA is concerned that elimination of such pilots would have the effect of eliminating a safety feature not present on similar products designed for direct main burner ignition. HPBA’s Energy Conservation Task Force is continuing to investigate these issues, but does not believe that a standard amendment to eliminate continuous pilots in products certified to the ANSI Z21.97 standard would be appropriate at this time.

3. Other Topics

There was brief discussion of other issues that are under consideration by HPBA’s Energy Conservation Task Force but not directly relevant to DOE’s proposed energy conservation standard for “hearth products.”

Respectfully Submitted,

Ryan Carroll
Director - Government Affairs
Hearth, Patio & Barbecue Association