

EC125-09/10 Part I & Part II

EECC Requested Final Action: Approved as Modified by the Public Comment

EECC Reason Statement:

EC125 should be approved as modified by this public comment.

Although EC125 was recommended for approved as submitted by the IECC Code Development Committee, a concern was raised at the hearing that fireplace systems regulated by the U.S. Department of Energy would be preempted by federal law. This public comment adds an exception that will alleviate any preemption issues that may arise from adding requirements to DOE-regulated equipment.

EECC Proposed Modification to Original Proposal:

Part I – IECC

403.10 Fireplace systems (Mandatory). Fireplace systems shall not have continuously burning pilot lights.

Exception: Fireplace systems regulated by the U.S. Department of Energy.

Part II – IRC

N1103.9 Fireplace systems. Fireplace systems shall not have continuously burning pilot lights.

Exception: Fireplace systems regulated by the U.S. Department of Energy.

Proposal History:

Committee Recommended Action on Original Proposal at Public Hearing:

Part I IECC – Approved as Submitted

Part II IRC – Disapproved

Committee Reason(s) for Recommended Action:

Part I IECC – At this time, there are sufficient products available to allow the code to require pilotless lighters for fireplace systems.

Part II IRC – The committee was concerned that, in some cases, pilots are safety devices, and therefore the proposal would severely hurt some product manufacturers. In addition, this represents minimal savings.

Initial Recommendation of EECC: Approve

Initial Proposal for Reference:

EC125–09/10
403.10 (New); IRC N1103.9 (New)

Proponent: Bill Prindle, ICF International, representing the Energy Efficient Codes Coalition; Jeff Harris, Alliance to Save Energy; Harry Misuriello, American Council for an Energy-Efficient Economy (ACEEE); Garrett Stone, Brickfield, Burchette, Ritts & Stone; Steve Rosenstock, Edison Electric Institute; Brian Dean, ICF International

THIS IS A 2 PART CODE CHANGE. PART I WILL BE HEARD BY THE IECC COMMITTEE. AND PART II WILL BE HEARD BY THE IRC BUILDING/ENERGY COMMITTEE. SEE THE TENTATIVE HEARING ORDERS FOR THESE COMMITTEES.

PART I – IECC

Add new text as follows:

403.10 Fireplace systems (Mandatory). Fireplace systems shall not have continuously burning pilot lights.

PART II – IRC BUILDING/ENERGY

Add new text as follows:

N1103.9 Fireplace systems. Fireplace systems shall not have continuously burning pilot lights.

Reason: This language is consistent with the ban on continuously burning pilot lights for pool heaters currently in the IECC. Under a recent US Department of Energy rulemaking, residential gas cooking equipment will also not be allowed to have continuously burning pilot lights.

According to the Hearth, Patio, and Barbecue Association, between 1.0 and 2.1 million gas fireplace / hearth systems are shipped to North America every year (about 54 to 69% of total hearth shipments. See <http://www.hpba.org/index.php?id=238> for more details). Many of these units are shipped to new homes with pilot lights that are only capable of burning continuously, ranging from 800 to 1,200 Btu's per hour. For a fireplace that has a pilot light using 1,000 Btu/hr, and is in "standby" mode for 8000 hours per year (fireplace is used 5 hours per day for 150 days of the year), the pilot light uses 8 million Btu's, or 80 therms. At a national average cost of \$1.20 per therm, the cost to a typical consumer is \$96 per year.

As a reference point, according to AGA Gas Facts 2007, a typical gas range uses about 55 therms per year, and a typical clothes dryer uses about 50 therms per year (Table 10-1, page 78). In fact, according to the AGA publication, in the Pacific region of the US, residential natural gas fireplaces use almost as much energy (20.8 Mcf) as residential natural gas water heaters (21.3 Mcf).

Significant energy savings are available with current technology. With advanced controls (electronic spark ignition, for example), the standby energy losses are eliminated, and the average consumer saves at least \$96, based on the example shown.

Cost Impact: The code change proposal will increase the cost of construction.

PART I – IECC

Public Hearing:	Committee:	AS	AM	D
	Assembly:	ASF	AMF	DF

PART II – IRC BUILDING/ENERGY

Public Hearing:	Committee:	AS	AM	D
	Assembly:	ASF	AMF	DF

ICCFILENAME: PRINDLE-EC-26-403.10-N1103.9