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From: Hudson, Jeremy [jHUDSON@URC.COM]
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Subject: Outdoor Wood Boiler regulations

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INDEPENDENT REGULATORY
REVIEW COMMISSION

These proposed regulations will severely limit the use of alternative heating sources.

My outdoor boiler saved me over \$3000 last year compared to propane. Plus it is easily and safely operated with a generator. I wouldn't be comfortable relying solely the delivery service of propane at my location. Currently I pay ~\$1600/year in taxes. I receive no natural gas service, internet access, garbage service and the road is barely maintained. I have gone through extended power outages and road blockages that even prevented getting mail, at one point for 5 days. My current configuration meets and exceeds all manufacturer recommendations. My lot is long and narrow. I live along side Allegheny National forest and one neighbor on the other. He also heats with wood he uses an old indoor wood furnace which smokes more than mine. With these new proposals a new install would be impossible for either of us. His land borders a hunting camp that's not even inhabited most of the year.

Requiring 500 feet, approximately 170 yards for a new install is extremely prohibitive. The distance will restrict many rural residences. The cost and lost efficiency, (Taller chimneys increase draft). Most outdoor boilers are designed for a shorter stack because of cost, draft, and durability. Requiring a tall chimney in many circumstances will require ugly, expensive scaffolding.

Also these devices are constantly improving; adding further regulations will increase cost and discourage homeowners from upgrading to cleaner more efficient devices.

These proposed restrictions are also unfair to those of us who have spent the thousands of dollars to install clean burning, safe, and efficient alternative heat sources without any mention of indoor wood furnaces or stoves. These regulations also do not account for the many homemade outdoor boilers in service which could never be tested for phase 2 standards, taking an option away from some of the most vulnerable people in our society.

Restricting devices to only the winter months is also prohibitive. Most of these devices are also used to heat domestic hot water. Some of these units are used to heat swimming pools during the summer months. I am even working on a hydronic clothes dryer for my unit. As technology improves I would like to eventually generate electricity using thermo-electric.

Further regulation of these devices will also put an undue financial burden on rural folk who already are suffering from disproportioned lower home value, lower wages, less economic opportunity, and higher unemployment.

The option to burn coal should also not be prohibited. Most homeowners who have this option like it for an alternative because it is less expensive than propane or fuel oil. It is also less labor intensive due to extended illness etc....

These devices also contribute to reducing our dependence on foreign energy sources and since burning wood is a renewable resource it is an ecological win. They allow an alternative from a commodity market traded energy source susceptible to extreme fluctuations. They also provide relief for any homeowner expecting electric rates to rise due to deregulation.

I believe any regulations concerning the use of alternative energy sources should be delegated to the community level. This would allow situations to be resolved on a common sense, case by case basis.

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