



**Jason Thomas**

Director, Regulatory Affairs

HVAC Americas

O 317-240-5246

C 317-518-5629

August 18<sup>th</sup>, 2021

Elizabeth Scheele

California Air Resource Board

1001 I Street,

Sacramento, California 95814

Submission: <https://www.arb.ca.gov/lispub/comm/bclist.php>

**RE: Proposed Amendments to the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants and Foam End-Uses**

Dear Ms. Scheele,

Carrier provides fire safety, security, building automation, heating, ventilation, air conditioning and refrigeration systems and services to promote integrated, high performance buildings that are safer, smarter, and more sustainable. Carrier is the founder of the modern HVAC industry and operates across the globe. Our range of products includes unitary residential and commercial products, including ducted and ductless HVAC, transport refrigeration products, chillers, and related building services.

Carrier appreciates staff's consideration of stakeholder comments submitted on the first 15-day language released May 13<sup>th</sup>, 2021. Carrier supports the proposed modification to split AC chillers from IPR chillers in table 3. Carrier also supports modifying the language to clarify that it is the temperature of the chilled liquid leaving the chiller that designates the specific end-use. Finally, Carrier supports CARB's decision to add the words "or sold for use" to §95376(c)(2)(C)(2). This change to the reporting requirements more closely aligns with the distribution of refrigerant in commerce and will help accelerate the use of reclaim in service.

Carrier request CARB to reconsider comments previously submitted to update §95376(a)(4)(C) to provide Optional Early Action Credit for products sold in any state not just California. The California building code continues to be on a schedule that would not allow low GWP equipment to be installed until late in 2024. Meanwhile, an increasing number of other states are taking actions to allow this equipment to be installed earlier. Providing credit to manufacturers for early action in other states would help manufacturers incentivize consumers and contractors to create demand, which would not exist otherwise.



**Jason Thomas**

Director, Regulatory Affairs

HVAC Americas

O 317-240-5246

C 317-518-5629

Carrier also request CARB to reconsider comments previously submitted to remove §95376(c)(2)(C)6. It is likely impossible for manufacturers to attest the certified reclaimed refrigerant is not being purchased, used, or counted to comply with any other government requirement(s), private or voluntary program(s), or any other credit(s) or incentive(s). This is especially true considering the joint petition submitted by CARB and many other states to EPA on July 15<sup>th</sup>. This petition request EPA to use CARB's proposed regulation as a model for a national regulatory structure. If EPA were to move forward, it is not clear how manufacturers would comply with §95376(c)(2)(C)6. Carrier maintains its position this section should be removed.

In closing, Carrier appreciates the opportunity to provide these comments and the movement towards finalizing this regulation. If you have questions regarding our suggestions, please reach out to me for further discussion.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jason Thomas".

Jason Thomas

Director, Regulatory Affairs

Carrier

CC: Matt Thornblad, Director of Government Relations