

November 9, 2018

Governor Edmund G. Brown  
c/o State Capitol, Suite 1173  
Sacramento, CA 95814

Mary D. Nichols, Chairperson  
Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**Subject: Letter of support for incentive program for end users adopting low-GWP refrigeration systems**

Dear Governor Brown and Chair Nichols,

On behalf of VaCom Technologies, I am writing to express support for establishing an incentive program to allow supermarkets, food processors, and other end users to adopt low-global warming potential (GWP) refrigerants to replace hydrofluorocarbons (HFCs) used in commercial and light-industrial refrigeration systems.

VaCom Technologies, based in California and working nationally, provides consulting and analysis services, energy efficiency projects, and performance monitoring—all addressing facilities with refrigeration systems. VaCom has worked for 25 years with California utilities, codes and standards bodies and CARB, to promote energy efficiency and progress towards more sustainable refrigerated facilities. We execute projects for companies in the food and beverage and refrigerated logistics sector, and provide consulting including refrigerant choices and conversions. In the retail sector, we have been the core refrigeration consultant for Walmart since 2006, analyzing refrigerant and refrigeration systems for new construction and retrofits.

I always emphasize this point: In the refrigeration industry nationally and globally, California is watched closely for its actions in research, efficiency programs and innovation. Much of what is done in California is copied elsewhere, importantly by ASHRAE, leading directly to national building standards. Many recent commercial and industrial refrigeration product introductions tie directly to efforts in California, in large part due to Title 24, the first building code to include standards for refrigerated facilities and systems.

An incentive program has the power to enable transformative change by helping to overcome current market hurdles to adoption of energy efficient, low-GWP refrigeration systems. These alternative systems are commercially available but face significant market hurdles to widespread adoption due to high up-front costs that are beyond the financial capabilities of many end users. By providing incentives to supermarkets and other end users, California can help create economies of scale for manufacturing, designing, installing, and maintaining these low-GWP systems and equipment.

We strongly support funding for a statewide incentive program that will minimize the barriers related to the upfront costs of low-GWP technologies and allow for their widespread adoption. Our customers support sustainability, but overall cost-effectiveness is essential to obtain project capital.

Sincerely,



Doug Scott  
VaCom Technologies

cc: Pamela Gupta, Bart Croes, Ryan McCarthy (Air Resources Board)