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March 13, 2018

Ms. Pamela Gupta
California Air Resources Board
Research Division
1001 I Street
Sacramento, CA 95814

Subject: Air Resources Board proposed prohibitions on use of certain hydrofluorocarbons in stationary refrigeration and foam end-uses

Dear Ms. Gupta,

On behalf of Emerson, I appreciate the opportunity to comment on this notice of public hearing to consider the proposed regulation for prohibitions on use of certain hydrofluorocarbons in stationary refrigeration and foam end-uses dated January 30, 2018.

Emerson Commercial and Residential Solutions, a business segment of Emerson, is a leading provider of heating, air conditioning, and refrigeration solutions for residential, industrial, and commercial applications. The group combines best-in-class technology with proven engineering, design, distribution, educational, and monitoring services to provide customized, integrated climate-control solutions for customers worldwide. The innovative solutions of Emerson Commercial and Residential Solutions, which include industry-leading brands such as Copeland Scroll™ and White-Rodgers™, improve human comfort, safeguard food, and protect the environment.

Emerson supports the state of California's efforts to reduce climate change impact through using lower global warming refrigerants, refrigerant leak detection and monitoring services, and reclaiming of refrigerants, although a national approach to HFC phasedown is preferred over a state by state effort. Adopting portions of US EPA SNAP rules 20 and 21 as outlined in the proposal is a reasonable first step in achieving a 40 percent reduction of HFC emissions below 2013 levels by 2030, but Emerson would like to suggest the following:

- Use Jan 1, 2020 as the prohibited dates across all stand-alone equipment and vending machines.
- Petition EPA SNAP to have R448A, R449A and R449B added to the acceptable alternatives list for all stand-alone equipment and vending machines.

These modifications will provide refrigeration manufacturers consistency in timing and more refrigerant options as they design and implement changes across similar product lines, while still allowing California to meet its objectives of providing an initial framework in transition to lower GWP refrigerants. Emerson would also like to suggest the Air Resources Board provide a list of EPA acceptable alternative refrigerants for each specified end use. This will help provide clarity to the industry.

I appreciate the opportunity to provide these comments. Emerson supports efforts to reduce the direct and indirect climate impact of HVACR equipment with lower global warming solutions that are technically and economically feasible and ready to comply with the codes. We hope that these comments are useful and look forward to participating in California Air Resources Board rulemakings in the future.

If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Rajan Rajendran". The signature is written in a cursive style with a horizontal line under the name.

Rajan Rajendran