From: Tom Nau
To: ARB Clerk of the Board
Cc: Tom Nau
Subject: hfc2020
Date: Thursday, May 27, 2021 12:52:37 PM

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This request is to extend the start time of the new regulations for at least one year as the refrigeration industry- suppliers, refrigeration contractors, technicians and parts wholesalers – from what I have been able to find, do not appear to be ready to meet the requirements for refrigerated storage systems in California unless R448a or R449A equipment is allowed. It is amazing on how many contractors we find unaware of the pending regulations with most users totally in the dark.
COVID significantly impacted the refrigeration industry in 2020, but is still impacting numerous suppliers today including those located outside the US, with some having to shut down their facilities if any workers are diagnosed with COVID.
You may not be aware that 2021 is turning out to be a banner year for the refrigeration equipment industry due to the slow down during 2020 due to COVID. This is resulting in ship dates that used to be 6-8 weeks extending 16-18 weeks – and in some cases 12 – 14 weeks now getting close to 30 weeks.
This demand is resulting in significant parts shortages for the OEMs and is now showing up at refrigeration wholesalers as well as significant price increases – up to 12% to 15% for equipment.
This is putting extra load on the engineering departments to find alternate parts, which takes them away from working on alternate refrigeration systems to HFC.
At the same time, this increase in demand is creating extra load on local building authorities causing permit delays of up to 4 months.
Based on the above coupled with the new regulations for 2022 it may leave many projects in limbo because they did not get permitted by the end of 2021 or the equipment does not get manufactured in 2021.
With all of this in mind, we respectfully ask that the new regulations be delayed for one year.

Regards,

Working from my home office, please use my cell #714-335-5987

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