

May 28, 2021

Elizabeth Scheele  
California Air Resources Board (CARB)  
1001 I Street, Sacramento, California 95814  
P.O. Box 2815, Sacramento, California, 95812



**Subject:** JCI comments regarding California Air Resources Board Draft 15 – Day Proposed Regulation: *Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, and Other End Uses*

Dear Ms. Scheele,

Johnson Controls (JCI) appreciates the opportunity to provide comments regarding CARB’s proposed 15 – Day regulation: *Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, and Other End Uses* per the direction given by the California Air Resources Board leadership given on December 10, 2020.

JCI is a leading global provider of heating, ventilating and air conditioning equipment, building controls, security and fire/life safety solutions which includes brands such as York®, Metasys®, SimplexGrinnell®, and Zettler. Several of JCI’s businesses are leaders in the fire / life safety arena. This knowledge and experience makes JCI uniquely qualified to address major industry transitions such as the one being proposed by CARB. The company has ~104,000 employees and ~2,000 locations across six continents. Since JCI first set sustainability goals in 2002, the company has reduced greenhouse gas emissions from our global operations by 51%. JCI is one of the most highly rated sustainability companies in the world (MSCI AAA; Ethisphere Institute’s Most Ethical Companies, FTSE4Good Index). JCI is proudly a leading member of “We are Still In”; we fully support the Paris Climate accord and publicly advocate for and urge action. We have met and exceeded our emission reduction targets and offset 100% of our US plant emissions in the U.S. with renewable energy. JCI also recently publically announced its Low Global Warming Potential (GWP) choice of R454B for its stationary AC (unitary products) and air-cooled chiller products which is the lowest EPA SNAP<sup>1</sup> approved alternative for such systems<sup>2</sup> and further demonstrates JCI’s environmental and sustainability commitments.

JCI fully supports the CARB HFC staff proposal and the subsequent December 10, 2020 board endorsement for the following transition sectors and dates:

- January 1, 2023 for PTAC and RAC equipment,
- January 1, 2025 for all other stationary air conditioning equipment,
- January 1, 2026 for VRF equipment.

In alignment with our consistent position regarding safety; JCI feels that it is critical that distributors, contractors and inspectors be fully trained on the safe use, handling and storage of A2L’s prior to any widespread market introduction into the “other stationary AC products” sector where charge volumes are currently restricted. While JCI fully supports the proposed January 1, 2023 effective date for small charge PTAC and RAC equipment; it does not support earlier introduction of “the other stationary or VRF” sectors prior to the codes being updated within the state of California. JCI urges that CARB ensure there are no potential loopholes (e.g. via a broad interpretation of the definition of residential dehumidifier’s) whereby allowable charge volume increases are incorporated as updates to the 2022 California Mechanical Code (e.g. Title 24, Part 4) allowing for the premature installation of traditional split systems and packaged units that fall under the CARB category sector of “other stationary air conditioning equipment” prior to July 1, 2024 which is the expected effective date of the next revision of the California Mechanical Code.

JCI also actively engaged in and fully supports the 15 – Day comments submitted by the Air-conditioning, Heating and Refrigeration Institute (AHRI) of which JCI has been and remains a long-standing member.

JCI does seek clarity on the proposed requirement that OEMs commit to purchase or take ownership of at least 10% of the new refrigerant an OEM sells and installs in California between 2023 and 2024. As part of its normal course of business, JCI’s Building

---

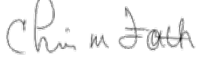
<sup>1</sup> Environmental Protection Agency Significant New Alternatives Program delisting and approval of regulated substances (e.g. refrigerants)

<sup>2</sup> <https://www.johnsoncontrols.com/media-center/news/press-releases/2021/05/27/johnson-controls-selects-environmentally-sustainable-r-454b>

Solutions North America (BSNA) services business purchases or takes ownership of various type of used refrigerants including R410A, from various sources which are ultimately collected and stored in large, bulk tanks. The recovery of this used refrigerant occurs at different times and from different sources throughout the year. JCI would like clarification that for any R410A it has already recovered or subsequently reclaimed prior to the enactment of this rule, that it be granted future credit towards its 10% commitments for its actual "use" in either new factory shipped equipment or for use in its aftermarket services business. Because this is a normal ongoing part of JCI's services business and the sources and timing of the recovery of used refrigerants vary; we feel it would be unfair to discount the actual use of such refrigerant. JCI feels that the actual use of any reclaimed R410A refrigerant is just as critical to reducing HFC emissions as the recovery itself. In alignment with AHRI and the industry, JCI feels it would be an undue administrative burden to provide detailed records of use for each individual recovery or sale.

JCI appreciates the opportunity to submit these written comments and looks forward to working with CARB on its future serving rule-making.

Respectfully,



Chris M Forth  
Executive Director  
Regulatory, Codes & Environmental Affairs  
Johnson Controls  
chris.m.forth@jci.com  
(405) 826-5802