August 6, 2019

Chair Mary Nichols
California Air Resources Board
1001 I Street
PO Box 2815
Sacramento CA 95812

Dear Chair Nichols,

The signatories to this letter support pragmatic, predictable, and cost-effective measures that allow the California Air Resources Board (CARB) to meet the state’s hydrofluorocarbon (HFC) emissions reductions target as defined in California Senate Bill 1383 – a 40 percent reduction in 2030 from 2013 levels. The following measures provide industry with certainty and sufficient time to comply with the new obligations.

We support policies to limit use of HFCs in commercial refrigeration technologies provided they include the following. California should:

- Adopt appropriate safety standards into California Building Code to enable low GWP solutions prior to transition dates.
- Adopt additional regulations prohibiting refrigerants with a global warming potential (GWP) and dates as noted in the table below.

Note: Commercial Refrigeration equipment with charge less than 50 lbs is covered by CaSNAP’s adoption of EPA SNAP rules 20 and 21 and therefore not addressed in the table below.

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Charge [lbs]</th>
<th>Original Proposal</th>
<th>Updated Proposal - Two Step Approach</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Step 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>GWP Limit</td>
<td>Transition Year</td>
</tr>
<tr>
<td>Large CR – New</td>
<td>&gt;300</td>
<td>150</td>
<td>2021</td>
</tr>
<tr>
<td>Medium CR – New</td>
<td>&gt;50, &lt;=300</td>
<td>1500</td>
<td>2021</td>
</tr>
<tr>
<td>Cascade CO2 Systems</td>
<td>&lt;=300</td>
<td>1500</td>
<td>2021</td>
</tr>
<tr>
<td>Cold Storage Warehouses</td>
<td>&gt;=300</td>
<td>1500</td>
<td>2021</td>
</tr>
<tr>
<td>Cold Storage Warehouses</td>
<td>&lt;300</td>
<td>150</td>
<td>2021</td>
</tr>
</tbody>
</table>
Flammable refrigerants cannot be used per ASHRAE 15 in hallways and egress areas, where ice machines are often located.

[2] Date is contingent on the adoption of Safety Standards into California State Code.

- Implement this prohibition based on the date of manufacture.
- Allow the distribution of products from California to other states in which they are legal for sale in cases in which California’s regulations differ from those of other states.

In addition to supporting the policies above, we also:
- Support robust enforcement and strong disincentives for non-compliance for HFC measures.
- Commit to work to complete relevant safety standards and strongly support their adoption into building codes as quickly as possible.
- Support CARB working with the California Energy Commission (CEC) to encourage proper installation, commissioning, maintenance, and servicing of commercial refrigeration systems to reduce refrigerant leaks and maintain energy efficiency.
- Support continued improvements to refrigerant management program provisions and allowances for reclaim within servicing. For example, CARB could require leak detectors be used for systems containing greater than 50 lbs of charge.

We believe these measures balance environmental benefit with minimizing the cost impact on consumers, all while providing adequate time for manufacturers, distributors, and contractors to prepare for a safe and efficient transition to lower-GWP technologies.

We believe that our recommendations will help continue the tradition of California’s leadership in technology and environmental regulations while providing market certainty which will benefit consumers and the industries that serve them.

Respectfully,

Helen Walter-Terrinoni

Helen Walter-Terrinoni
Vice President Regulatory Affairs
Air-Conditioning, Heating, and Refrigeration Institute
(302)598-4608
Hwalter-terrinoni@ahrinet.org

Cc: Virgil Welch
Elizabeth Scheele
Michael Fitzgibbons
Pamela Gupta