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June 5, 2023

Kevin Day, Interim Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Public Comment on SFM 05/22

Dear Mr. Day and Commission Members:

These comments are submitted by the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) regarding the proposed building standards of the Office of the State Fire Marshal regarding the 2022 California Mechanical Code, California Code of Regulations, Title 25, Part 4 (SFM 05/22).

AHRI is the trade association representing manufacturers of heating, ventilation, air conditioning, refrigeration (HVACR) and water heating equipment. With more than 300 members, AHRI is an advocate for the industry and develops standards for and certifies the performance of the products manufactured by our members. In North America, the annual output of the HVACR and water heating industry is worth more than \$44 billion. In the United States, the industry supports 1.3 million jobs and \$256 billion in economic activity annually.

AHRI and its members support the reduction of greenhouse gas emissions and welcome new lower global warming potential (GWP) refrigerants to the market. Accordingly, AHRI and its members have played a leading role in ensuring that national model codes, as well as locally adopted codes, are ready for the transition to lower GWP refrigerants. Going forward, the most technologically advanced and efficient HVACR equipment produced will be using these more environmentally friendly refrigerants.

AHRI supports the proposals in SFM 05/22 because they help align the California Mechanical Code with 2024 national model codes, including the 2024 UMC, with respect to equipment using lower GWP refrigerants, many of which are Safety Class A2L. As proposed, the mechanical code is silent on commercial refrigeration using A2L refrigerants. Adding a new Section 1104.10, as proposed below, provides additional clarity regarding situations where A2L refrigerants can be employed for high probability, direct refrigeration systems.

1104.10 Applications for Commercial Refrigeration. High-probability commercial refrigeration systems using Group A2L refrigerants shall comply with the equipment listing and ASHRAE 15.

AHRI respectfully asks for the Commission's support of SFM 05/22 with the addition of Section 1104.10, as proposed above.

Sincerely,

A handwritten signature in cursive script that reads "Samantha M. Slater". The signature is written in black ink and is positioned below the word "Sincerely,".

Samantha M. Slater
Senior Vice President, Government Affairs