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Comment Received From: William Slope
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Objection to AHRI 420 Test Procedure

Letter attached

Additional submitted attachment is included below.

April 20, 2026

To Whom it May Concern,

I am writing this letter to object to the proposed AHRI 420 test procedure inclusion in the 2025 Energy Code Table 120-6-A-2. This procedure was added by the only equipment manufacturer that is currently able to comply with this requirement, Evapco Inc.

AHRI 420 is a narrowly written standard that only applies to standard models. This is a critical problem. Industrial refrigeration applications require a wide range of operating conditions and infinitely variable custom designs to meet end user specifications and project performance requirements. AHRI 420 ratings only apply to five standard rating conditions.

Alternatively, AHRI 410 and ASHRAE 33 are standards that allow performance confirmation over a wide range of operating conditions. They allow for variable coil dimensions (tube size / thickness, fin spacing, coil height and width, number or rows deep). These standards are well written and widely industry accepted.

Including this column specifying AHRI 420 for "test procedure" in Table 120-6-A-2 will effectively create a complete monopoly for one manufacturer in the state of California, Evapco, Inc. This will be a major diminishing of end user's options. In many cases, this exclusion of competition will prevent the installation of more energy efficient evaporators made by other manufacturers.

I am in no way opposed to new standards being implemented to meet efficiency minimums, however, the standards must be well written for the application. AHRI 420 is simply not this. My recommendation is to remove this column from Table 120-6-A-2.

Sincerely,

William Slope
Refrigeration Sales Engineer
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B.S. Industrial Engineering, Cum Laude, California Polytechnic State University, San Luis Obispo, 2017