

**DOCKETED**

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*Comment Received From: Jamon Craig  
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**Request to revise Title 24 requirements for CO2 remote condensing units**

*Additional submitted attachment is included below.*

## Title 24 CO2 Remote Condensing Units

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California Energy Commission  
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Re: Request to revise Title 24 requirements for CO2 remote condensing units

Dear Commissioners:

On behalf of Heatcraft Refrigeration Products, this letter respectfully requests that the California Energy Commission revise Title 24, Part 6, so that CO2 remote condensing units are not categorically required to include adiabatic gas coolers in order to comply in applicable climate zones.

The current prescriptive requirement does not reflect the realities of today's CO2 equipment market. The adiabatic gas-cooler requirement was developed when central CO2 rack systems were the primary focus, but the market now includes factory-built CO2 remote condensing units and other smaller distributed systems for which that requirement can be unnecessarily burdensome or poorly suited.

From a practical standpoint, requiring adiabatic gas coolers can add cost, maintenance burden, water-use concerns, and design complications without necessarily being the best path to strong energy performance. A more effective approach would allow compliance through equivalent performance, giving manufacturers, engineers, and end users flexibility to achieve energy goals through other design strategies.

Updating the code is also important because refrigerant regulations are rapidly transforming the market. CO2 remote condensing units are becoming an important low-GWP solution for both large and small businesses, and California policy should preserve a clear path for these systems rather than unintentionally narrowing the market to a smaller set of compliance options.

While this issue may otherwise wait until the 2028 code cycle, earlier action is needed. The Commission is respectfully encouraged to work with stakeholders to identify an alternative pathway that could clarify compliance treatment or allow this change to move forward sooner, so that code requirements do not unnecessarily slow adoption of climate-beneficial CO2 technology.

Thank you for your consideration of this request.

Sincerely,

Jamon Craig  
Senior Compliance Engineer  
Heatcraft Refrigeration Products