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<b>Project Title:</b>	2028 Energy Code Pre-Rulemaking.
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<b>Document Title:</b>	Nelson Pinheiro Comments - Request to Revise Title 24 requirements for CO2 remote Condensing Units
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<b>Organization:</b>	Nelson Pinheiro
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*Comment Received From: Nelson Pinheiro*  
*Submitted On: 5/7/2026*  
*Docket Number: 25-BSTD-03*

**Request to Revise Title 24 requirements for CO2 remote  
Condensing Units**

*Additional submitted attachment is included below.*

Stakeholder Comment Letter Template: Title 24 CO2 Remote Condensing Units

Rivacold America, INC  
3535 Gravel Springs Road EXT  
Buford, GA 30519  
www.rivacold.com

California Energy Commission  
Dockets Office  
715 P Street  
Sacramento, CA 95814

May 7<sup>th</sup> of 2026

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

Dear Commissioners:

On behalf of Rivacold America, 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 to comply in applicable climate zones. Rivacold is a manufacturer of refrigeration solutions with more than 60 years of experience designing, producing, and installing refrigeration solutions for groceries, convenience stores, and industrial applications, utilizing natural CO2 as the primary refrigerant.

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.

Our company has been manufacturing CO2 for decades and has been improving our systems to avoid adiabatic solutions due to the costs inquired during manufacturing, installation, and regular usage of the equipment. Our solutions have been designed to reduce the ROI of our customers, be accessible also to small stores' format, and to improve energy efficiency, reducing the user's annual utilities bill. Specifically, water availability has become a huge constraint for projects to be approved, especially in CA, due to high costs and availability.

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,

Nelson Pinheiro  
Sales Director  
Rivacold America Inc.