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Request to revise T24 requirement for Adiabatic gas coolers on CO2 condensing units

As a refrigeration engineer with over 30 years working in California as well as other states, the use of adiabatic gas coolers is a very effective way to lower energy use in CO2 systems. But adiabatic gas coolers with small condensing units are not always economical and also have negative impacts on water use, water waste, and carry increased costs when not applied, maintained, or installed correctly. As a compromise that would capture a large portion of the energy savings from the use of adiabatic gas coolers and close the loop hole that "all CO2 racks with a condenser mounted to it is a condensing unit" issue would be to allow an exception for small condensing units based on size (Btu capacity) or as a % of the total store refrigeration load by temperature group (e.g., not more than 15% of the total refrigeration load, by temperature rating Low Temperature and Medium Temperature, can be served by non-adiabatic gas coolers).

Thank-you for your consideration,

Glenn Barrett
DC Engineering Manager, Sr. Associate Partner