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*Comment Received From: Jon Murray*  
*Submitted On: 5/15/2026*  
*Docket Number: 25-BSTD-03*

**Title 24 adiabatic cooling requirements for CO2 CDUs**

*Additional submitted attachment is included below.*



A  DOVER COMPANY

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

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

Dear Commissioners:

On behalf of Hillphoenix, 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. For over 130 years Hillphoenix has been an industry leader in the production of Commercial and Industrial Refrigeration products for the Food Retail Industry, Cold storage, Distribution warehouses around the world. Hillphoenix has also been an industry pioneer in the development of CO2 Transcritical refrigeration systems. We strongly believe that removing this requirement will benefit end users, industry, utilities, and engineering professionals. Allowing the latest and greatest technology available to be designed into systems benefiting all stakeholders.

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.

As water scarcity and drought have become more severe in portions of the southwest and water use restrictions increase more municipalities are giving consideration to restricting the use of Adiabatic cooling. This causes reduced product design solution availability and project delays.

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, as CO2 is the only viable class A1 refrigerant option currently available. California policy

should preserve a clear path for these systems rather than unintentionally narrowing the market to a smaller set of compliance solutions.

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,

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