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*Comment Received From: Ignacio Varela Chaparro*  
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**Request to revise Title 24 requirements for CO2 remote condensing units**

*Additional submitted attachment is included below.*



**EPTA S.p.A.**  
Sede legale  
Via Mecenate, 86  
20138 Milano – Italy  
Iscrizione Registro Imprese Milano  
Cod. Fisc. e P. Iva n. 04160730968  
Cap. Soc. Euro 80.334.855 i.v.  
Iscritta al REA di Milano n. 1730229

**KYSOR WARREN**  
**Epta US Corporation**  
1 Corporate Ridge Parkway  
Columbus, GA 31907  
(800) 866-5596  
T. +1 706-565-9113  
[www.kysorwarren.com](http://www.kysorwarren.com)

Kysor Warren Epta US  
1 Corporate Ridge Parkway  
Columbus, Georgia 31907  
(800) 866-5596  
[www.kysorwarren.com](http://www.kysorwarren.com)

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

May 14, 2026

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

Dear Commissioners:

On behalf of Kysor Warren Epta US, 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. We are a part of the Epta Group, a global manufacturer of commercial refrigeration systems and refrigerated display cases, engineering and producing energy-efficient, sustainable solutions—focused on natural refrigerants—to support supermarkets, food retailers, and related applications in reducing environmental impact and meeting evolving regulations.

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. The implementation of adiabatic gas coolers necessitates a reliance on water consumption—a practice that is increasingly subject to regulatory prohibitions in several regions. Beyond environmental and compliance concerns, these systems introduce additional maintenance requirements and elevated product costs, which can significantly restrict equipment availability, particularly within smaller capacity ranges. Furthermore, many end users remain hesitant to integrate water-based solutions into their refrigeration infrastructure, citing the operational risks of water leaks and potential damage to store roofing systems.



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,

Ignacio V. Chaparro  
Senior R&D Manager, Sustainability & New Technologies  
Kysor Warren Epta US