

DOCKETED

Docket Number:	25-BSTD-03
Project Title:	2028 Energy Code Pre-Rulemaking.
TN #:	270872
Document Title:	Colmac Coil Manufacturing, Inc. Comments - Questions Regarding Single-Manufacturer Compliance Under AHRI-420
Description:	N/A
Filer:	System
Organization:	Colmac Coil Manufacturing, Inc.
Submitter Role:	Public
Submission Date:	6/19/2026 9:53:07 AM
Docketed Date:	6/19/2026

Comment Received From: Colmac Coil Manufacturing, Inc.
Submitted On: 6/19/2026
Docket Number: 25-BSTD-03

Questions Regarding Single-Manufacturer Compliance Under AHRI-420

Attached for inclusion in Docket No. 25-BSTD-03 is our comment letter regarding the AHRI-420 certification requirement in Table 120.6-A-2.

Additional submitted attachment is included below.



PO Box 571 · Colville WA 99114 · USA
Tel +1. 509.684.2595 · Fax +1.509.684.8331
www.colmaccoil.com

June 19th, 2026

California Energy Commission

Subject: Docket No. 25-BSTD-03
Questions Regarding Single-Manufacturer Compliance Under AHRI-420

To Whom It May Concern,

This letter serves to inform the Commission of our objection to the requirement that refrigeration evaporator ("air cooler") manufacturers certify and list their equipment in accordance with AHRI-420. This letter also requests the Commission's response to the following legal and procedural questions.

The AHRI-420 certification requirement adopted in Table 120.6-A-2 appears to have had the practical effect of limiting compliance to a single manufacturer currently participating in the California industrial refrigeration market. Based on our understanding, EVAPCO is currently the only manufacturer able to offer AHRI-420 certified industrial evaporator coils that satisfy this requirement for many refrigerated warehouse applications in California. As a result, competing manufacturers may lack a practical pathway to participate in these projects regardless of their technical capabilities or product performance.

Please explain:

1. Did the California Energy Commission determine, prior to adoption, that only a single manufacturer would be able to comply with this requirement for industrial evaporator coil applications?
2. Did the Commission conduct any legal, competition, or antitrust review regarding the market impacts of this requirement?
3. Prior to adoption of this requirement, how many manufacturers did the Commission determine would be able to certify products under AHRI-420, and where is that analysis documented in the rulemaking record?

Please provide a written response addressing these questions.

Sincerely,

A handwritten signature in black ink that reads "Joseph Fazzari". The signature is written in a cursive, flowing style.

Joe Fazzari, P.E.
President
Colmac Coil Manufacturing