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Comment Received From: Internation Institute of All-Natural Refrigeration
Submitted On: 11/10/2026
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Support of Proposed Changes

Please see attached letter.

Additional submitted attachment is included below.

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November 10, 2026
California Energy Commission
Re: 2028 Pre-Rulemaking docket 25-BSTD-03

Dear CEC and others concerned,

This letter is written regarding of proposed changes to the California Energy Code (Title 25, Part 6) specifically concerning those related to refrigerated facilities and equipment.

The International Institute of All-Natural Refrigeration (IIAR) IIAR is a non-profit association that is considered a professional society as well as a trade association. We represent over 4000 members who are end-users, manufacturers, contractors, consultants, academics, and others in the industrial and commercial refrigeration industry. These members are instrumental to the supply and preservation of our nation's food and beverage resources, among many other functions pertaining to the use of refrigeration. Most of our members are practitioners of the use of natural refrigerants such as ammonia, carbon dioxide, and propane. Many of them are on the forefront of developing equipment and systems that are state of the art for increasing energy efficiency, reducing greenhouse gas emissions, and piloting the future applications of refrigeration technology.

We appreciate the opportunity to comment and the work that the CEC is doing to enhance the code, promote energy efficiency, and the reduce greenhouse gas emissions.

Table 901.1-(2) Fan-powered Evaporators – Minimum Specific Efficiency Requirements
The editorial changes enhance the understanding of the required conditions for specific rating conditions. The additional footnotes provide clarity and align with industry practice to rate evaporators at the incoming air conditions at the coil, rather than an average room condition which could skew ratings depending on the application. However, some applications require greater than 0" static pressure (e.g. ducted evaporators, specialized refrigerated makeup air units that are not covered by the exception in 901.1.5.5), or greater air volume and thus greater fan power is needed. It is unclear how evaporators for such applications would be rated or otherwise addressed and suggest that the existing exception be expanded to include these applications.

901.1.6.7 Specific Efficiency
The changes proposed to this section add clarity and are welcome.

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901.1.7.4 Compressor volume ratio control.
The proposed language adds specificity appropriate for compressor Vi compatibility which provides an efficiency advantage for larger compressors but may introduce a penalty for smaller compressors.

901.1.8.1 Transcritical C02 Gas Coolers (Refrigerated Warehouses)
The proposed language to permit air-cooled gas coolers for the smaller applications indicated in the exception is welcome. This technology has advanced in recent years and will aid in addressing the need to integrate low GWP alternatives for such applications.

902.1.5 Transcritical C02 Gas Coolers (Commercial Refrigeration)
The proposed language to permit air-cooled gas coolers for the smaller applications indicated in the exception is welcome. This technology has advanced in recent years and will aid in addressing the need to integrate low GWP alternatives for such applications.

Acceptance Testing Appendices
The changes proposed for NA7.10 and NA7.20 are welcome and we believe that these will encourage testing to be accomplished and thus enhance the overall desire of greater energy efficiency and owners' expectations of performance.

Sincerely,



Eric M. Smith, P.E., Vice President of Technology, Advocacy, Research and Publications - IIAR