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November 1, 2021

Jennifer Elwell
Bay Area Air Quality Management District
375 Beale Street
Suite 600
San Francisco, CA 94105
Submission: jelwell@baaqmd.gov

RE: Carrier Comments on Proposed Amendments to Regulation 9 Rule 4

Dear Ms. Elwell,

Carrier provides fire safety, security, building automation, heating, ventilation, air conditioning and refrigeration systems and services to promote integrated, high performance buildings that are safer, smarter, and more sustainable. Carrier is the founder of the modern HVAC industry and operates across the globe. Our range of products includes unitary residential and commercial equipment, including ducted and ductless HVAC, transport refrigeration units, chillers, and related building services.

Carrier appreciates the early engagement of the Bay Area Air Quality District (BAAQMD) staff with industry on the proposed amendments to regulation 9 rule 4. In these comments, Carrier suggests the inclusion of new definitions in 9-4-200 to remove the potential for confusion among the regulated community. Additionally, Carrier supports conducting an interim report evaluating the feasibility of 9-4-301.3 and requests the report be conducted at least three years prior.

Definitions in section 9-4-200

Carrier request the inclusion of the definitions as written in South Coast Air Quality Management District (SCAQMD) Rule 1111. These are well understood by manufacturers, distributors, and contractors. If staff chooses not to adopt Rule 1111 definitions in its entirety, at a minimum staff should define mobile homes and mobile home furnaces. These terms are introduced in 9-4-301.3 without definitions. If not addressed, it could lead to confusion and unintended compliance issues. Carrier recommends the following definitions for these terms, which align with rule 1111.

- Mobile Home means a prefabricated structure on a permanently attached chassis.



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- Mobile Home Furnace means a furnace designed specifically and solely for installation to heat a mobile home.

Interim Report (Section 9-4-405)

Carrier strongly supports conducting an interim report to determine the viability of compliance with 9-4-301.3. Carrier supports the direction to evaluate technology, cost, installation, and incentive programs in this analysis. Carrier requests that staff conduct this research for each product class rather than generally for natural gas-fired furnaces. It is likely the compliance feasibility will vary for different product classes. Product considerations that should be considered are residential and commercial. Within each of those products, consideration should be given to condensing and non-condensing as well as weatherized and non-weatherized.

Carrier requests staff to consider modifying the language in 9-4-405 to require an interim report be issued at least three years before the compliance date of 9-4-301.3. Manufacturers need at least two to three years to design and launch new product in the market. Considering that the board and public stakeholders need time to review the report, issuing the report two years prior does not leave manufacturers enough time to respond to potential updates. Carrier recommends the report be issued three years in advance to allow for minor updates while keeping the January 1, 2029. If significant updates are required based on the findings of the report, the compliance date would need to be moved.

Thank you for consideration of these comments and engaging manufacturers in this process. If you have questions regarding our suggestions, please reach out to me for further discussion.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jason Thomas".

Jason Thomas
Director, Regulatory Affairs
Carrier

CC: Brooke Greenwood, Residential Furnace Product Manager
CC: Ted Cherubin, Light Commercial Product Manager