



Jason Thomas

Director Regulatory Affairs
HVAC North America
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October 17, 2024

Mr. Peter Campbell
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
Submission via email: pcampbell@aqmd.gov

RE: Carrier Comments on Preliminary Draft PAR 1111

Dear Mr. Campbell,

Carrier is a global leader in intelligent climate and energy solutions. With more than a century of expertise, we drive innovation while pursuing our customers first and helping protect our planet. Our range of products include residential and commercial heating, ventilation, and air conditioning (HVAC) products, transport refrigeration products, chillers, and HVAC building services.

In the proposed rule, (d)(2) states *“On and after the applicable Table 2 compliance date, no person shall manufacture, supply, sell, resell, offer for sale, import, or Install, any Furnace for use in the South Coast AQMD, that exceed the Table 2 NOx emission limits. The applicable Table 2 compliance dates for New Building types shall be determined based on the construction or alteration completion date.”* If our understanding is correct, new buildings that are started in 2025 but completed in 2026 would require zero NOx equipment. The timeline of equipment specification, purchase, manufacturing, installation, and building completion creates significant compliance challenges. Builders, equipment manufacturers, distributors, and contractors may be unable to change course in a short timeline, which will lead to significant delays in building projects. Additionally, restricting installation for existing buildings in January 1, 2028 will likely create issues in the market as well. Manufacturers, distributors, and contractors have uncertainty when predicting demand. This will inherently lead to misalignment in supply and demand. Carrier requests South Coast Air Quality Management District to allow the sale of product built prior to the compliance date to be sold and installed for both new and existing buildings.

30 S. Meridian Street, Suite 500, Indianapolis, Indiana 46204

Thank you for consideration of these suggestions. If you have questions or would like to have a deeper conversation on HVAC supply chain dynamics, please email to coordinate time for discussion.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Thomas". The signature is fluid and cursive, with the first name "Jason" being more prominent than the last name "Thomas".

Jason Thomas
Director, Regulatory Affairs
Carrier