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September 30, 2024

Mr. Mo Madani  
Florida Building Commission  
Delivered via email to [mo.madani@myfloridalicense.com](mailto:mo.madani@myfloridalicense.com)

RE: Glitch Amendment #3 to update the 8<sup>th</sup> Edition of the Florida Building Code

Dear Mr. Madani,

Trane Technologies, Inc. (Trane) appreciates the opportunity to provide input on the process to update the 2023 Florida Building Code. Trane is a global leader in the air conditioning and heating industry and has been actively engaged in updating codes and standards globally to ensure safe transition to low flammability refrigerants.

Glitch Amendment #3 submitted by Amanda Hickman includes consensus guidance on safely using these refrigerants based on the most up to date research and development around the world. Additionally, the U.S. EPA requires the transition away from current refrigerants in January 1, 2025 under 40 CFR 84.54. Without the implementation of ASHRAE 15 2022, Declaratory Statement 2024-024 prevents the use of residential, unitary, and VRF systems with these new refrigerants, and leads to a market disruption in Florida.

Trane strongly urges the Mechanical Technical Advisory Committee and the Commission to approve Glitch Amendment #3 to update the ASHRAE 15 reference to the 2022 Edition (ASHRAE 15-22), including all addenda issued through July 31, 2024.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,  
*Helen Walter-Terrinoni*

Helen Walter-Terrinoni  
Director, Policy & Advocacy  
Trane Technologies

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