

## SAVING THE AIM ACT SUPPORT H.J. RES. 38/S.J. RES 14

**Original Goals of the AIM Act.** The AIM Act, which was passed with strong bipartisan support, had the laudatory goal of achieving an 85% reduction in HFCs by 2036. The AIM Act empowered EPA to adopt regulations to meet this goal.

**AIM Act Goals Subverted by Two Overreaching EPA Regulations.** The bipartisan goals of the AIM Act were subverted by an overreaching EPA that ignored the 2036 phasedown timeline, mandated the use of untested equipment that had not been approved by local zoning boards, and imposed significant, costly and unnecessary interim requirements on refrigerants that were already being phased out.

**Problems with EPA's HFC Management Rule.** EPA's HFC Management Rule (MR) is an example of regulatory overreach by imposing unnecessary regulation of equipment that is already being phased out. The current MR:

- Causes a dramatic increase in appliances regulated by reducing the equipment charge size from 50 pounds to 15 pounds
- Creates burdensome, unnecessary compliance obligations for equipment being phased out
- Causes a lack of supply of reclaimed refrigerants, which will likely result in loss of refrigerated product, food safety concerns, and higher grocery prices

**Problems with EPA's HFC Technology Transition Rule.** EPA's HFC Technology Transition Rule (TTR) is a rushed, forced transition to new refrigerants and equipment that will lead to significant disruption in the refrigeration equipment market. It is clear that refrigeration equipment vendors over-promised to EPA what was achievable in the short term. The TTR rule is in litigation, but the current EPA has recognized the problems associated with the TTR and is in the process of drafting a new TTR, which is expected to be **consistent with the original objective of the AIM Act and more likely to lead to a successful rollout. It is not, however, in any form a repeal of the AIM Act.** A revised TTR will:

- Allow additional time for equipment using alternative refrigerants to be developed, tested and made commercially available
- Allow local zoning boards time to amend their zoning codes so that retailers can actually make use of new equipment
- Allow retailers time to analyze and design new equipment that best serves their needs and to get the useful life out of existing equipment, a premise of the AIM Act

**Changes to Overreaching EPA Regulations Will Save Retailers over \$200 Billion.** Changing the TTR and the MR will not only lead to a more successful rollout of the AIM Act, **but it will also save retailers over \$200 billion.** Such unnecessary expenditures could be put to better use building new stores, hiring more employees or offering savings to consumers.

**Save the AIM Act By Using the Congressional Review Act to Repeal the HFC Management Rule.** Supporting the CRA (H.J. Res. 38/S.J. Res 14) will ensure that a successful rollout of the AIM Act can be achieved consistent with the purpose and the guidelines set forth in the AIM Act. The uncertainty and impracticality of the rushed MR passed under the Biden Administration prevents retailers and businesses from making strategic decisions to provide safe, reliable, and cost-effective products to their customers.

**The Biden administration's EPA rules, enacted 10-05-2023, under the AIM Act of 2020, restrict hydrofluorocarbon (HFC) use, undermining President Trump's goal American First of revitalizing U.S. manufacturer, more jobs, less foreign's dependence and curbing inflation.**

**These Biden-EPA regulations have triggered severe economic consequences:**

1. **\*\*Surging Inflation\*\***: Homeowners and businesses face a 60% rise in average air-conditioning (AC) costs, with refrigerant service prices soaring 600% from March 15, 2017, to March 15, 2025, fueling inflation and straining household budgets (**Exhibit "A"**).
2. **\*\*Renewed Dependence on China\*\***: Trump-era policies reduced U.S. reliance on Chinese refrigerants, but the 2023 rules mandate specific HFC's, reversing progress, enriching China, and raising costs for Americans (**Exhibit "B"**).
3. **\*\*Unfair Global Burden\*\***: Unlike China, India, Canada, Australia, and Japan, which allow flexible refrigerant choices, the U.S. faces unique mandates, saddling Americans with less choices and higher costs while others benefit from less expensive options. These regulations enrich foreign manufacturers using R454b refrigerant, particularly in China, while R410a and other refrigerant—widely available in U.S. and less than a quarter the cost of mandated alternatives—remains viable worldwide (**Exhibit "C"**).
4. **\*\*Offshoring Jobs\*\***: Costly domestic refrigerant requirements push A/C manufacturers to relocate to Mexico, China, Japan, and South Korea. Today, 70% of A/C units sold in the U.S. are imported, hollowing out American industry.
5. **\*\*Trade Disadvantages\*\***: Foreign A/C units, often made with China-sourced refrigerants, enter Mexico duty-free and then to the U.S. without tariffs, undercutting U.S. firms and contradicting Trump's trade policies (**Exhibit "E"**).
6. **\*\*Forced System Upgrades\*\***: The rules ban R410a use in new air conditioning systems, forcing homeowners to spend \$10,000+ on new A/C systems within a year of installation, adding financial strain and driving inflation (**Exhibit "F"**).
7. **\*\*Market Chaos\*\***: Implementation has caused supply disruptions, with waiting times up to eight (8) months, hurting consumers while global competitors thrive. See restricted products by Sectors and compliance deadline acceleration exceeding Congress authorization (**Exhibit "G"**).

*Representative Dunn's (H.J. Res. 38) and Senator Roger Marshall's (S.J. Res. 14) joint resolution to repeal Biden EPA's 2023 rule threatens U.S. interests, deserve congress support under CRA. The opposition with special interest attempted to confuse the issue, since this joint resolution is only nullifying a small Subsection (h) of AIM Act 2020.*

Compiled by: H.T. Mai, Inc.  
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Source: EPA Fact Sheet - Technology Transitions Program  
OAR October 2023

## **LIST OF EXHIBITS**

- EXHIBIT “A” :**                    **NATIONAL GROCERS ASSOCIATION (NGA): Keep Your Cool: Don’t Increase Your Refrigeration Costs & RESIDENTIAL & COMMERCIAL A/C COST INCREASE – Same 5-tons A/C unit in 2024 cost \$8,750 increased in 2025 \$11,513 or 34.34%.**
- EXHIBIT “B” :**                    **HONEYWELL WARNING LETTER TO CUSTOMER – Biden EPA 2023 rule forced to buy Refrigerant R-454B from China.**
- EXHIBIT “C” :**                    **ACHR NEWS – R-454B shortage and cost increase and Warning for nasty Summer of 2025 & Johnston Supply – Restricted supply of R-454B due to shortage.**
- EXHIBIT “E” :**                    **NEWS ARTICLES – Igas USA, Tampa, Florida – News on 6, Tulsa, Oklahoma – Steve’s Plumbing & A/C Services, Honolulu, Hawaii – Golden Rules Plumbing & Air, Grimes, Iowa.**
- EXHIBIT “F” :**                    **RESIDENTIAL & COMMERCIAL A/C COST INCREASE – Same 5-tons A/C unit in 2024 cost \$8,750 increased in 2025\$11,513 or 34.34%.**
- EXHIBIT “G” :**                    **WHO ARE THE NEXT VICTIMS of Biden-EPA 2023 Rules.**

The National Grocers Association (NGA) represents 21,000 independent community grocers and wholesalers across the United States. Independent community grocers account for 33 percent of all grocery sales, exceeding \$250 billion, and more than 1 million American jobs.

## What the HFC Management Rule Costs Grocers

### >15 LB Charge Size Greatly Increases Cost

- ✦ One company estimates that their number of covered appliances will increase from 600 to 6,100 individual units. They expect this increase to cost an estimated \$1 billion in additional capital costs to the company over the next 10 years.

### New Surveying Required

- ✦ Another company estimates that conducting site surveys of all its stores to identify the newly covered appliances would cost roughly \$500 to \$1,000 per store, depending on size and location.

### Existing High Cost Will Increase

- ✦ A multi-store operator completed their refrigerant update last year, and it cost \$315,000 to modernize the system at one of their stores.
  - ✦ When replacing a grocery refrigeration system all valves and hardware must be updated to accommodate the newer refrigerant. It isn't as simple as draining the old refrigerant liquid and replacing it.
  - ✦ The company needs to stagger their system upgrades due to the high cost. Unlike other store improvements, the upgrades do not bring in any additional revenue to offset the costs.

### Will Need to Change Out Brand New Systems

- ✦ A single-store operator updated several coolers and freezers at their store in 2020, but they are now considered noncompliant because they use older HFCs. This cost was \$129,000.
- ✦ This operator was able to access a REAP grant, to help complete the project.
- ✦ Most members are unable to get assistance covering these types of costs and they usually need to increase prices to cover capital improvements.

EXHIBIT "A"

# At the HEART of the community.





## **Keep Your Cool: Don't Increase Refrigeration Costs**

The National Grocers Association (NGA) represents 21,000 independent community grocers and wholesalers across the United States. Independent community grocers account for 33 percent of all grocery sales, exceeding \$250 billion, and more than 1 million American jobs.

### **New Fines Put Businesses At-risk**

- ✦ The EPA is likely to levy large fines for grocers that are unable to afford these upgrades.
- ✦ Businesses will also need to contend with EPA fines if they're found to be in violation of the rulemakings.
- ✦ While EPA has not levied fines on AIM Act rules specifically, in July of last year, they fined a NY supermarket chain \$400,000 for violating EPA's Recycling and Emissions Reduction Rule. This chain now must also find \$13.5 million to adopt a comprehensive refrigerant compliance management plan.

EXHIBIT "A"

# **At the HEART of the community.**

**National Grocers Association**  
202.938.2570 | [www.nationalgrocers.org](http://www.nationalgrocers.org)





Amanda Josey  
General Manager  
Stationary Refrigerants

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Honeywell International Inc.  
115 Tabor Road  
Morris Plains, NJ 07950

## Important Update on Honeywell's Solstice® and Genetron® Products

April 11, 2025

Dear Valued Customer,

The rapidly evolving geopolitical and economic climate continue to impact our Solstice® and Genetron® product portfolio.

Due to unprecedented demand for 454B, which cannot be met with domestic production alone, we are forced to source a significant portion of the supply through international markets to meet North American market demand.

We have absorbed the bulk of the impact to date in order to support North American growth; however, we have reached a point where the cumulative effect of increased costs of raw materials needed to meet demand for 454B is no longer sustainable without affecting reliability and the services we provide.

For 454B orders placed on and after February 15, 2025, we will implement a surcharge of 42% on each invoice, reflecting a portion of the increased costs we are exposed to through recent tariff announcements.

In addition, we will implement a price increase of \$4/lb on all new orders of 454B as of April 9, 2025, with a 42% surcharge invoiced on the new price.

Pricing for other Solstice® HFO products will increase by 10%, and pricing for Genetron® products will increase by 5%, as of April 9, 2025, in order to offset rising raw material costs.

We remain committed to delivering the service and quality you expect and truly value working with you on your business needs. We are continuing to monitor price fluctuations so all U.S.-based businesses throughout the value chain have the chance to prosper together. Please do not hesitate to contact your account representative or Honeywell customer service team with any questions .

Sincerely,

Amanda Josey  
GM, Stationary Refrigerants  
Honeywell International

EXHIBIT "B"



**REFRIGERANT CHALLENGE:** Due to a cylinder shortage, contractors may find it challenging to obtain R-454B. (Staff photo)

# Contractors Should Plan Ahead to Obtain R-454B

A cylinder shortage is causing longer lead times for the new refrigerant

[Joanna R. Turpin](#)  
March 20, 2025

As the HVACR industry transitions to lower-GWP refrigerants, contractors are growing increasingly concerned about the difficulty of obtaining cylinders of R-454B. This problem stems from a nationwide cylinder shortage, which is causing lead times to stretch up to 10 weeks and making it challenging for many contractors to secure the new refrigerant.

Supply houses are feeling the strain as well, as they struggle to meet the needs of contractors who are eager to install the new R-454B equipment. And with the busy summer season right around the corner, many are worried there won't be enough R-454B to meet customer demand. While refrigerant and equipment manufacturers expect the situation to resolve itself over the next few months, they are encouraging contractors to plan ahead and work closely with their suppliers to ensure they have enough R-454B.

## From The Field

Megan Zamora, manager at Climate Control Systems in Frankfort, Illinois, just recently became aware of the R-454B shortage. Since it's still chilly in the Chicago area and demand for air conditioners is a few months away, the shortage has not yet affected her company.

"Most of the supply houses were still selling off the R-410A inventory until about six weeks ago," she said. "One of our suppliers has a decent inventory of R-454B refrigerant, and another one has 1,400 jugs scheduled for delivery by the end of the month. Hopefully, it will continue that way."

As far as R-454B equipment is concerned, Zamora said that in the last month, all of their supply houses have received an ample supply of residential systems.

"I can tell you, it was difficult to acquire the A2L equipment from November to January," she said. "Currently, there are commercial equipment shortages, with R-454B packaged units continuing to be out of stock with extensive lead times."

Brian McDaniel, owner of Verona Noland, a supply house in Verona, Virginia, is definitely worried about the availability of R-454B this summer. Earlier this year, he purchased a skid of R-454B cylinders in anticipation of the transition from R-410A.

"Then we started getting emails from our refrigerant suppliers that we could only buy four jugs of R-454B at a time," he said. "Then the emails said that they were completely out, and there was a six- to eight-week lead time on R-454B. So I started digging, and I found a place to buy R-454B, but they were charging \$730 a jug. If I wait six weeks with our refrigerant supplier, the price is only \$310 a jug."

When it comes to R-454B systems, McDaniel said he hasn't had trouble securing equipment so far. However, he's concerned there may not be enough cylinders of R-454B available for contractors to top off systems or repair leaks after installation.

"It's really tough on the wholesalers right now, because you have to make a decision about staying in business. Do you buy R-410A equipment, or do you transition fully to R-454B?" he said. "There are a lot of supply houses that transitioned, and now they can't get the refrigerant until mid-summer."

McDaniel decided to stock up on R-410A systems, estimating he has enough inventory to last through mid-July. After that, unless R-454B becomes readily available for purchase, he's unsure of what to do.

"We preplanned and bought all this extra R-410A equipment, which could come back to bite us if all of a sudden R-454B is abundant," he said. "But I think it was a tight enough gamble that we're going to be able to get rid of it." He added that even though the shortage of R-454B may not be much of an issue right now, "Come June, it's going to be a major issue across the nation. Without a bunch of R-454B being released, it's going to be a nasty summer."

## Cylinder Shortage

According to Christina Spalding, Americas sales manager, OEM and aftermarket - thermal and specialized solutions at Chemours, the manufacturer of R-454B, the primary issue with R-454B packaged product for the aftermarket is A2L cylinder availability.

"Chemours currently has lead times of approximately 10 weeks for new orders, so depending on when a distributor placed orders, it may impact availability," she said. "Demand is very strong in the aftermarket, but the reality is that installations are just now starting to happen with new equipment."

Joe Giannetti, general manager of cooling, construction, and fire suppression at Worthington Enterprises, stated that as the industry leader in A2L cylinder production, the company has a long-standing history of producing safe, high-quality cylinders specifically designed for mildly flammable gases.

"During the current load-in phase, where demand is significantly higher than normal, we are working closely with customers to forecast orders and plan for on-time delivery," he said. "Worthington Enterprises increased its production capacity, and through the hard work of our employees, we are well-positioned to fulfill all current orders. As always, we are committed to collaborating with our customers and we remain on track to support them with safe, quality cylinders in alignment with the A2L refrigerant transition."

There is plenty of R-454B gas available, said Trent Davis, director of marketing and product management at Lennox Commercial HVAC, but the cylinder shortage is creating challenges with packaging and distributing it to individual users.

"Lennox equipment manufacturing is unaffected by the cylinder shortage, because we receive our R-454B refrigerant in bulk," he said.

Lennox has already converted its full line of commercial HVAC rooftop units (RTUs) and ducted split systems to low-GWP refrigerant, and Davis said that those products are flowing into the market. Based on customer feedback, Lennox converted its premium products to R-454B first, including Model L and Enlight RTUs.

"We have mixed inventory of our standard-efficiency products, with R-410A equipment being sold through as new R-454B equipment arrives at distribution centers," he said.

While HARDI has received reports from distributors of extended lead times for packaged R-454B, CEO Talbot Gee, believes this is an unavoidable disruption that comes with any transition.

"It is exacerbated in this instance from a product going from essentially 0 to excess of 40,000 metric tons in a very short timeframe," he said. "Once all manufacturers have fully transitioned and shipped their summer orders, we believe the service market will slowly fill out."

Still, contractors should touch base with their supply houses now to check on availability of R-454B in the coming months. As Davis noted, "We are encouraging our customers to plan their R-454B cylinder purchases at least 90 days ahead of time to ensure adequate refrigerant on hand for the summer peak."



Joanna Turpin is a Senior Editor at *The ACHR NEWS*. She can be contacted at 248-786-1707 or [joannaturpin@achrnews.com](mailto:joannaturpin@achrnews.com). Joanna has been with BNP Media since 1991, first heading up the company's technical book division before moving over to *The ACHR NEWS*, where she frequently writes about refrigerants and commercial refrigeration. She obtained her bachelor's degree in English from the University of Washington and worked on her master's degree in technical communication at Eastern Michigan University.

**EXHIBIT "C"**

## FW: Important Update Regarding R-454B

From: Ben Meng (ben@igasusa.com)

To: marcm@igasusa.com; htmal@aol.com

Date: Thursday, April 17, 2025 at 05:28 PM EDT

Please update my new email address: [ben@igasusa.com](mailto:ben@igasusa.com)

Best Regards,



8105 Anderson Rd  
Tampa, FL 33634  
[www.igasusa.com](http://www.igasusa.com)

**Ben Meng**

President

Cell: 813-298-8101

Direct: 813-437-2118

Office: 813-443-0757

Fax: 813-886-7900

Email: [ben@igasusa.com](mailto:ben@igasusa.com)

**From:** Sean Kerr <seank@igasusa.com>

**Sent:** Thursday, April 17, 2025 2:34 PM

**To:** Ben Meng <ben@igasusa.com>

**Cc:** Jorge Alvarez <jorge@igasusa.com>; Brett Boscovich <brettb@igasusa.com>

**Subject:** Fw: Important Update Regarding R-454B

**From:** Johnstone Supply

**Sent:** Thursday, April 17, 2025 2:30 PM

**To:** Dustin Hawkins

**Subject:** [EXTERNAL]Important Update Regarding R-454B

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Dear Valued Customer,

→ As many of you are aware by now, the unprecedented demand for R-454B refrigerant has reached a volatility point where we have to implement some purchasing limitations to ensure our customers who have made commitments to purchase R-454B equipment from Johnstone Supply Wines Group have refrigerant and equipment available.

→ Effective immediately, R-454B will only be sold to registered Coleman & Bosch dealers through Johnstone Supply Wines Group. All purchases of R-454B must be ordered through your Johnstone sales representative. All Coleman & Bosch dealers will be able to purchase (1) R-454B cylinder per 10 outdoor units purchased. Your sales representative will track those sales to ensure we have refrigerant available for you.

EXHIBIT "C"



The Johnstone Supply Wines Group is uniquely positioned with both R-454B refrigerant and equipment. We have strongly encouraged our customers who are not purchasing R-32 equipment to consider doing so as a second option. Make no mistake, this cooling season is going to be extremely challenging, but we can help!

→ With over 280 million systems already installed worldwide, R-32 is a proven, non-proprietary commodity that has a lower cost than R-454B, outstanding performance, high efficiency, low charge capabilities, single component refrigerant, and is AVAILABLE.

If there is anything we can do to help you with your equipment needs, please contact your sales representative as soon as possible.

Good Selling!



Andy Calleros  
VP-Sales



Johnstone Supply | 50 Athletic Drive | Earth City, MO 63045 US

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EXHIBIT "C"



**iGAS USA**

**+1 813 443 0757**

8105 Anderson Rd.  
Tampa, Florida 33634

## **iGas USA: Helping You Keep Your Cool**

6 February 2025

### **HFC Management Rule Realities: How It Affects Your Constituents**

#### **Regulations Could Destroy Small Businesses in Your District:**

- Current EPA rules mandating the phase-out of HFC refrigerants require the replacement of necessary refrigeration equipment in many applications, including essential equipment used in grocery and convenience stores. Replacement is required very quickly, as the newly mandated refrigerants cannot be used in older equipment.
- Due to supply chain issues, there is a shortage of parts and labor in the refrigeration industry - completing the work on time is a difficult challenge.
- A single-store operator can expect to pay \$120K to over \$300K to replace equipment. This expense is a hurdle most small businesses cannot overcome.
- As functioning refrigeration units are required for many businesses to remain in operation, the mandated financial burden will be devastating. The impact will, in all likelihood, result in a large number of defunct small businesses.
- Many operations such as convenience stores, gas stations and smaller grocery stores serving rural communities will simply cease to exist due to these regulations.

#### **Realities to Understand:**

- Compliance to this mandate requires updated valves and hardware, in addition to the new refrigerant. The effort and expense of requirements will be significant – it's not as simple as pouring in a different fluid.
- If updates are not completed by the deadline, the EPA can levy large fines, further hastening the end of small businesses nationwide.
- The new refrigerants are flammable, unlike HFCs. The Air Conditioning Contractors of America (ACCA) states the problem: "HFC refrigerants are being replaced mostly by mildly flammable refrigerants as well as flammable refrigerants in certain, specific, end-use cases. Flammability is not something contractors have to worry about with HFC or CFC refrigerants."
- HFCs are less harmful to health than natural refrigerants, such as ammonia and CO2.
- If the sole intent of the mandate is to reduce the Global Warming Potential (GWP), there are gases available today that can do so without requiring such major, unbudgeted, and unprecedented regulations.



## 5 KEY FACTS ABOUT NEW EPA HVAC REGULATIONS COMING IN 2025

***Starting Jan. 1, 2025, new EPA HVAC regulations will require lower GWP refrigerants. Here's what you need to know***

Tuesday, December 17th 2024, 8:06 pm

By: News On 6, Chinh Doan

**TULSA, Okla. -**

Big changes are coming to the HVAC industry starting January 1, 2025, due to new [EPA](#) regulations on refrigerants.

These rules aim to reduce environmental impact but could significantly affect how consumers buy or repair HVAC units.

From higher costs to new technologies, here's what you need to know to prepare for these changes:

### **1. New Refrigerant Standards Take Effect January 1**

The EPA will require refrigerants with a Global Warming Potential (GWP) below 700. This means the industry is shifting to options like R32 and R454B, which are at about 500 and about 650.

### **2. Expect Higher Costs for New HVAC Systems**

The cost of electric air handlers could increase by as much as 30%. Experts estimate that a new unit with installation will **cost between \$6,000 and \$8,000**. Manufacturers may offer rebates to offset some of these expenses.

### **3. Current Systems Are Being Phased Out**

[Joseph Pitts](#) with Pitts Heating and Air says manufacturers also have to phase down 90 percent of the current refrigerant they're making, which will drive up the price of the current refrigerant.

### **4. New Systems Come with Advanced Technology**

"There's going to be sensors on this coil that sense refrigerant, so if there's any leak, it's going to automatically shut off your air conditioner and run this fan continuously so as to not build up that refrigerant," he said.

### **5. Decision-Making Tips for Consumers**

According to HVAC experts, both old and new systems have pros and cons. Older systems may be more affordable upfront, while new systems align with environmental goals and future regulations. Consider your priorities when deciding.

"If they're big on global warming or the potential if that's their biggest concern, is that the refrigerant is going to leak out, then going with that new system is going to be the way to go, but if you're worried about functionality and price, the old system's a good way to go. I think you'll be fine either way. It's nothing to stress about," Pitts said.



**Chinh Doan**

Chinh Doan is honored to be back in her home state and working for Tulsa's #1 station! She joined News On 6 in January 2020. You can see her anchor weekend evenings and report week days.

**EXHIBIT "E"**

## 2025 AIR CONDITIONING REGULATIONS WILL INCREASE THE COST OF NEW SYSTEM

*From Steve's Plumbing & A/C Services  
Honolulu, Hawaii*

There are big changes coming to the HVAC industry in 2025. If you have been considering upgrading your air conditioning system, you may want to do it sooner rather than later. New regulations from the [Environment Protection Agency](#) (EPA) are impacting the way air conditioners are manufactured as well as the way they will operate, starting in early 2025.

### Why are the Price Air Conditioners Increasing in 2025?

The EPA has set a new standard for air conditioning systems, including central air and mini-split ductless systems. They are raising the bar for AC energy efficiency with the goal of being more environmentally friendly. Starting January 2025, the Global Warming Potential (GWP) ratings must be 750 or less for air conditioning units. The new units feature an improved refrigerant that will greatly decrease the emissions of greenhouse gases. Residential and light commercial air conditioners and heat pumps manufactured after January 1, 2025 must use [new refrigerants, commonly referred to as A2Ls](#). Ultimately this will have a positive impact for our planet, but a not so positive impact on the cost of installing a new air conditioning system.

### How Will 2025 EPA Regulations Affect the Cost of AC Systems in Hawaii?

Unfortunately, the new EPA regulations means the price for air conditioning units will go up in 2025. Prices for central air and mini split [AC systems will likely increase by about 20-25% because manufacturers must use new and improved technology](#) and equipment to achieve these energy efficiency goals. As people are rushing to replace their AC units before the cost increase hits, the older, more affordable AC units are starting to be sold out in some areas of Hawaii. It is best to shop around now and while both types of AC units are still available to purchase.

### When Should I Invest in a New AC System?

The time to invest in a new AC system for your home is now. Since this new mandate does not go into effect until the beginning of next year, the price for a new HVAC system is lower than it will be in 2025, if you can still find the more affordable systems in stock. Even an AC unit that is not 2025 compliant will still help your home be more environmentally friendly and bring a higher value to your home in 2025. Purchasing a 2025 compliant system is great too, since the energy savings of these super-efficient new systems will make your home more appealing to home buyers.

*Steve's Plumbing & A/C Services – Provided services to residents and businesses for 35 years located in  
Aloha State - Honolulu, Hawaii*

EXHIBIT "E"

## WHAT YOU NEED TO KNOW ABOUT AIR CONDITIONING CHANGES COMING IN 2025

August 12, 2024

By Mark Paup of GOLDEN RULES PLUMBING & AIR

904 NE Main Street, Grimes, IA 50111

Hey there, homeowners! If you've been considering upgrading your air conditioning system, you might want to consider some significant changes coming in 2025. With new rules set by the EPA, things are about to get a bit different—and more expensive. Let's break it down so you know exactly what's happening and how it could affect you.

### Why Are AC Prices Going Up?

Here's the deal: new EPA rules are raising the bar for how energy-efficient air conditioners must be. The idea is to make systems better for the environment, but it's also making them cost more. Think of it like this: buying a new phone with the latest features will cost more than an older model. The same goes for AC units. **Expect prices to increase by about 20-25% because manufacturers must use new tech and materials.**

Visit the [EPA website](#) for more on these new requirements.

### Will AC Units Be More Expensive in 2025?

Absolutely. The new rules mean that AC units will cost more starting in 2025. The shift to higher efficiency and new refrigerants will make manufacturing more expensive. Plus, older models will be phased out, which means there will be fewer of them available. So, if you're considering getting a new unit, it might be a good idea to act before the price jump hits.

### Why Are HVAC Systems So Expensive Right Now?

Right now, HVAC systems are pricier due to a few key reasons:

- **New Rules:** The new efficiency standards and refrigerants are raising production costs.
- **Old Models Phasing Out:** Manufacturers are slowing down production of older models to focus on new, compliant ones. This reduces availability and drives up prices.
- **Increased Demand:** As people learn about the upcoming changes, they rush to buy current models and rising prices.
- 

### How Much Does a New HVAC Unit Increase Home Value?

A new [HVAC unit](#) can give your home's value a nice boost. Modern systems are more efficient and make your home more appealing to buyers. Installing a new unit, on average, could raise your home's value by 5-10%. If you plan to sell, a new system could make your home stand out.

### What Can You Do to Prepare?

Here's how you can get ready for the changes:

- **Keep Your System in Shape:** Regular maintenance can help your unit last longer and run smoothly.
- **Think About Replacing Early:** If your system is getting old, replacing it before 2025 can help you avoid the higher costs that are coming.
- **Check for Rebates:** Look out for rebates and incentives to help offset the cost of upgrading to a new, energy-efficient system.

EXHIBIT "E"

# Marketing **Sales** Communication

DAIKIN COMFORT TECHNOLOGIES

## **C- GN-OT-1029**

**Date:** April 9, 2025  
**To:** Internal, Sales, Distribution, and Sales Representatives  
**From:** Steve Reed, Senior Vice President of Sales  
Doug Widenmann, Senior Vice President of Marketing  
**Subject:** **R-454B Refrigerant Cylinder Shortage**

In response to a March 20, 2025 article in ACHR The NEWS titled "[Contractors Should Plan Ahead to Obtain R-454B](#)," as well as feedback from our Sales team, we are aware of the potential lack of cylinders necessary for transportation of R-454B refrigerant. A quote from one of the contractors in the article stated, "Come June, it's going to be a major issue across the nation. Without a bunch of R-454B being released, it's going to be a nasty summer."

According to a representative from Chemours, the manufacturer of R-454B refrigerant in the US, the primary issue with R-454B packaged product for the aftermarket is A2L cylinder availability. The Chemours representative was quoted to say, "Chemours currently has lead times of approximately 10 weeks for new orders, so depending on when a distributor placed orders, it may impact availability."

Worthington Enterprises is the sole manufacturer of A2L cylinders in the US as certified by the Department of Transportation (DOT). Arkema, the manufacturer of R-32 refrigerant in the US, established early orders with Worthington Enterprises based on forecasts from Daikin and other OEM manufacturers which is expected to provide ample supply of cylinders for R-32 refrigerant.

The constrained supply of R-454B cylinders provides a potential opportunity to promote the many advantages of R-32. With over 280 million systems already installed worldwide, R-32 is a proven, non-proprietary commodity that, as of the date of this publication, has a lower cost than R-454B, outstanding performance, high efficiency, low charge capabilities, single component refrigerant, and is *AVAILABLE*.

Let our dealers know they have a competitive "Availability" advantage with R-32 refrigerant and equipment and let competing dealers know our doors are open for new business.

### **EXHIBIT "E"**

Note: This Sales Bulletin constitutes "Confidential Information" as defined in, and is subject to the terms of, your Distributor Sales Agreement.

DAIKIN COMFORT TECHNOLOGIES NORTH AMERICA, INC.

19001 Kermier Road • Waller, TX 77484 • (713) 861-2500 • [www.daikincomfort.com](http://www.daikincomfort.com)

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TAMPA, FLORIDA • 33607

DATE 3/4/2024

System Proposal			
Proposal submitted to:		Job Site (if Different)	
Address		Address	
City, State, Zip Tampa, FL 33618		City, State, Zip Tampa, FL 33618	
Phone	F-Mail	Phone	E-Mail
Job Name New 5-ton system			
We propose: To furnish, install and service under warranty (stated below) products or related equipment for your home or business in accordance with the conditions and specifications set forth in this proposal.			
Equipment Manufacturer to be: YORK		Outdoor Unit Model #	YC2F60TB21S SEER2 16
Indoor Unit Model # JHETC60HBCS2N1		Thermostat Model #	TH6210OU2001 Tonnage 5
Scope of Work			
Remove and Dispose of existing equipment			
All labor, materials, permits, tax required to complete the work during normal business hours			
Crane service for roof			
Flush and connect to existing refrigerant lines and drain			
New emergency drain pan with redundant drain safety devices			
Connect to existing duct system			
New thermostat to be Honeywell T6 programmable			
Connect to existing electrical. New disconnect included.			
Start-up, check and test equipment per factory specifications			
EXHIBIT "F"			
We propose to furnish complete, as above specified, for the investment of			
Payment to be made as follows: COD			
ask about our financing options			
Warranty		PURCHASE SUMMARY	
10 year compressor 10 years parts years heat exchanger (to original owner)		Total Investment	
5 year thermostat 1 year labor		Extended Warranty	
All work will be completed in a workmanlike manner, and materials are guaranteed to be as specified. Alterations or deviations involving extra costs will be performed only upon written orders, and will result in charges in excess of the estimate herein. All agreements contained herein are contingent upon strikes, accidents, acts of God, or other delays beyond our control. Owner shall carry fire, tornado, and other necessary insurance.		\$ -	
NOTE: This proposal may be withdrawn by us if not accepted within 30 days Authorized Signature		Utility Rebate	
This is a binding contract. Title to the equipment, parts, and other personal property described herein shall not pass to buyer upon delivery but shall remain vested entire purchase price, including labor, is paid in full. Payment is due upon installation of the equipment. Buyer acknowledges against Buyer's property if payment is not made timely. Buyer also agrees to pay all charges not paid In any litigation concerning this document or work performed hereunder, the parties waive the right to a jury trial, and the prevailing party shall be entitled to an award of reasonable attorney's fees and costs from the non-prevailing party, including reasonable attorneys' fees and costs for any litigation concerning the amount of the award.		Factory Rebate	
Signature: Date:		Amount Due on Completion \$ 8,570.00	



• TAMPA, FLORIDA • 33607

DATE 4/14/2025

## System Proposal

Proposal submitted to:		Job Site (if Different)	
Address		Address	
City, State, Zip Tampa, FL 33618		City, State, Zip Tampa, FL 33618	
Phone	E-Mail	Phone	E-Mail
Job Name Updated system replacement proposal for suite 14005			
We propose: To furnish, install and service under warranty (stated below) products or related equipment for your home or business in accordance with the conditions and specifications set forth in this proposal.			
Equipment Manufacturer to be: York		Outdoor Unit Model # YC460E2S11	SEER2 14.25
Indoor Unit Model # JHE60C5CH2SS1		Thermostat Model # TH6210U2001	Tonnage 5

### Scope of Work

Provide and install one (1) York 5-ton a/c system with electric heat. This uses new Puron Advance R-454b

Remove and Dispose of existing equipment

All labor, materials, permits, tax required to complete the work during normal business hours

Crane service for roof

Flush and connect to existing refrigerant lines and drain

New emergency drain pan with redundant drain safety devices

Connect to existing duct system and electrical circuits. New electrical disconnect included

New Thermostat to be Honeywell T6 Programmable

Start-up, check and test equipment per factory specifications

Payment to be made as follows: COD ask about our financing options

EXHIBIT "F"

Warranty		PURCHASE SUMMARY	
10 year compressor 10 years parts 1 years labor 5 years thermostat		Total Investment	\$ 11,513.00
All work will be completed in a workmanlike manner, and materials are guaranteed to be as specified. Alterations or deviations involving extra costs will be performed only upon written orders, and will result in charges in excess of the estimate herein. All agreements contained herein are contingent upon strikes, accidents, acts of God, or other delays beyond our control. Owner shall carry fire, tornado, and other necessary insurance.			
NOTE: This proposal may be withdrawn by us if not accepted within 30 days			\$ -
Authorized Signature			\$ -
This is a binding contract. Title to the equipment, parts, and other personal property described herein shall not pass to buyer upon delivery but shall remain vested in until the entire purchase price, including labor, is paid in full. Payment is due upon installation of the equipment. Buyer acknowledges that may file a lien against Buyer's property if payment is not made timely. Buyer also agrees to pay interest of on all charges not paid In any litigation concerning this document or work performed hereunder, the parties waive the right to a jury trial, and the prevailing party shall be entitled to an award of reasonable attorney's fees and costs from the non-prevailing party, including			\$ -
Signature: _____ Date: _____		Amount Due on Completion	\$ 11,513.00

The Biden administration's EPA rules, enacted October 5, 2023, under the AIM Act of 2020, restrict hydrofluorocarbon (HFC) use, undermining President Trump's goals American First, revitalizing U.S. manufacturing and curbing inflation.

**CONSUMERS AND BUSINESS SECTORS IMPACTED &  
WHO ARE THE NEXT VICTIMS?**

STARTING YEAR	IMPACTED CONSUMERS & BUSINESS SECTORS	
	SECTORS	SUB-SECTORS
<b>JANUARY 1, 2025</b>		
<b>January 1, 2025</b>	Stationary A/C and Heat Pumps	Residential & Commercial A/C
	Refrigerated Transport	
	Chillers	
	Ice Rings	
	Vending Machines	
	Retails food refrigeration stand-alone units	
	Remote automatic commercial ice machines	
<b>JANUARY 1, 2026</b>		
<b>January 1, 2026</b>	Self-contained automatic commercial ice machines	Batch type: harvest rate <=1,000 lb ice per 24 hours
	Cold storage warehouses	
	Industrial process refrigeration (not using chillers)	
	Retail food remote condensing units	
<b>JANUARY 1, 2027</b>		
<b>January 1, 2027</b>	Retail food refrigerated food processing and dispensing equipment	500 g of refrigerant and outside scope of UL 621, Ed. 7
	Self-contained automatic commercial ice machines	Batch type: harvest rate <=1,000 lb ice per 24 hours and Continuous type: harvest rate above 1,200 lb ice per 24 hours
	Data Centers, Computer Rooms A/C and Information Technology equipment cooling	
	Self-contained Automatic Commercial Ice Machines	
<b>JANUARY 1, 2028</b>		
<b>January 1, 2028</b>	Motor Vehicle A/C (All Model Year 2028)	Medium-duty passenger vehicles, Heavy-duty pick-up trucks and vans, Agriculture machines, Construction, Forestry and Mining equipment, and Commercial Utility vehicles
	Retail food refrigerated food processing and dispensing equipment	Ice cream makers within the scope of UL 621, edition 7

Source: EPA Fact Sheet - Technology Transitions Program OAR October 2023

**EXHIBIT "G"**