

Steve Owen

With the adoption of these rules, refrigerants with GWP above 750 are prohibited. This would allow refrigerants below 750 to still be used. Refrigerants with GWP below 750 require increasingly higher compressor pressures for an efficient refrigeration cycle. This is something we have found out as a result of a refrigeration project to use r514a, that has a GWP of 2. Higher pressures require MORE electrical power to move the same amount of refrigerant. Compressors with higher pressure capability are more expensive and are inherently LESS efficient. This goes against the supposed benefits WA DOE has written into the August 2023 publication, 23-02-080, -1-Benefits of proposed rule-1-. Please tell me how this can be resolved.