

# Vertiv

Vertiv submits these comments in response to Ecology's proposed amendment to Chapter 173-443 of the Washington Administrative Code.

Vertiv has reviewed Ecology's proposal to restrict certain hydrofluorocarbons (HFCs) used in products and equipment in the refrigeration and air conditioning sectors. As a major manufacturer of air conditioning equipment used in computer rooms, data centers and Information Technology Equipment Facilities (ITEF) we agree that our industry can move to the use of lower global warming potential (GWP) refrigerants if sufficient time is allowed. And we interpret the end-use that Ecology is proposing of -1-Other types of air conditioning equipment used in residential and nonresidential applications (New and existing facilities)-1- as being inclusive of air conditioning equipment used in computer rooms, data centers and ITEF.

In this regard, Vertiv supports a national date for imposing a GWP cap on refrigerants used in computer rooms, data centers and ITEF of January 1, 2029. We believe this amount of time is necessary to fully transition new equipment to be able to utilize 750 and lower GWP refrigerants. But given that the proposed rule would apply only within Washington, Vertiv is also able to support an earlier January 1, 2028 date in this instance.

To the extent that your office has questions regarding the highly specialized and mission critical air conditioning equipment used in this sector, we would be happy to supply additional information that you may require.

Thank you.