



COOLING & HEATING

July 21, 2025

Department of Ecology
Climate Pollution Reduction Program
Attn: Gopika Patwa
P.O. Box 47600
Olympia, WA 98504-7600

Mitsubishi Electric US
1340 Satellite Blvd.
Suwanee, GA 30024

Re: Chapter 173-443 WAC, Hydrofluorocarbons (HFCs) & Other Fluorinated Greenhouse Gases Rule

Dear Gopika Patwa,

Mitsubishi Electric US (MEUS), a leading U.S. based manufacturer of high efficiency all-climate heat pumps and Variable Refrigerant Flow systems (VRF), appreciates the opportunity to provide a brief comment in support of the proposed revisions to Chapter 173-443 WAC Hydrocarbons. We welcome the thoughtful changes proposed across regulated sectors and allowance for up to two years from prohibition dates for installation of VRF systems. The proposed edits to Chapter 773-443 WAC align Washington State with EPA Technology Transition timelines for VRF systems and prevents disruption to the HVAC supply chain and workforce in Washington.

We are confident that the net environmental impact of this change will be positive by allowing for continued momentum of the transition from fuel-based boilers and furnaces in commercial applications to electric VRF solutions leveraging an ever more renewable grid. Additionally, the benefit of the extension of installations allows for exhaustion of existing VRF inventory, preventing VRF equipment from becoming unusable and wastefully scrapped.

We greatly appreciate your efforts in the public comment process and careful adjustments that make Chapter 173-443 regulations workable while optimizing reduction of emissions that contribute to climate change. Mitsubishi Electric is committed to being a part of the solution and provide our appreciation as we collectively hasten the transition from fossil fuels to electrification for a better future for our communities, families, and planet. Please let us know if we can be of further assistance.

Sincerely,

Dana Fischer
Sr. Director of Regulatory Strategy