

DOCKETED

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Orion Distributing, Inc DbA Johnstone Supply

Additional submitted attachment is included below.

California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814

August 18, 2025

RE: Docket 24-OIR-03; Energy Data Collection – Phase 3

Dear Chairman Hochschild,

Thank you for the opportunity to provide feedback on Docket 24-OIR-03; Energy Data Collection – Phase 3.

I am the CEO of Orion Distributing, Inc Db a Johnstone Supply. We are a 12-location wholesale HVAC distribution business serving HVAC contractors in northern California.

Below are the RFI questions with answers providing Orion Distributing Inc's perspective for this concept.

1. Which steps of the supply chain are most/least appropriate for reporting of accurate equipment data, and why?

- The entire supply chain is inappropriate for reporting equipment data.
 - Distributors
 - 1. Lack of Information available to be shared:
 - a. Location of installation
 - b. Permit information
 - 2. Forced to share private business data that is essential to the success of the business into a compromised database. Such as, pricing and customers.

2. Should data be reported from more than one step of the supply chain? Why or why not?

- Data reported should not be reported at any point in the supply chain.
 - Private business data
 - Contradictory data with multiple submissions.
 - 1. A manufacturer may report a sale to a distributor in CA, but that distributor ships the product to another state for final sale. Additionally, a manufacturer may report a sale to another state, and the distributor then moves it into California.

3. How often should data be reported? Should reported data be more granular than the frequency of reporting (e.g., a quarterly report that includes monthly sales figures)?

- Data should not be reported at any point, but if it were, the frequency should be as minimal as possible, annually.

- Any data reporting that is greater than annual should use an API integration with ERP systems to automate the submission process. If CEC cannot create an automated option for reporters to report sales in California, it will create massive compliance costs.

4. What types of information are infeasible to report on?

- Location of Installation
- Permit Information
- Cost of Equipment
- Customer Names
- Warranty Information

5. How geographically accurate will the reported location of delivery be to its final installed location? Is there a category of geographic information, such as zip code or county, that would best or most accurately inform forecasting, policy and program efforts?

- Distributors are not able to provide any geographical reported location.
- Contractors are the only step in the supply chain that can provide information to the exact city. However, requiring that information be submitted is completely improper since it would require a disclosure of private business information that is vital to a successful contractor's business.

6. What cost impacts are incurred by reporting sales and distribution information consistent with a potential reporting requirement? What are the different electronic reporting capabilities of stakeholders at different points of the supply chain?

- Reporting sales and distribution adds additional administrative burdens onto our business. We run a lean, non-wasteful business, so it can be assumed a new hire would be brought in to be responsible for compliance. The cost of the new hire would then be passed down through the supply chain for each business, raising the price of equipment for the consumer.
- Different electronic reporting capabilities?
 - Our ERP system can track sales and inventory, and could theoretically be used to automate reporting data. This largely depends on the type of data required and may force us to pay for custom programing to comply with reporting requirements.

7. Should businesses below a certain size threshold be excluded from data reporting requirements? If so, what should the size threshold be and why is it appropriate?

- The general reporting requirements requested is inappropriate and isn't within the range of abilities for each business based on staff. Therefore, regardless of the business size the business would take on additional cost and be forced to raise price of the equipment. So in reality, all businesses be should excluded.

8. Who else collects this data? In particular, are there other governmental entities (i.e., federal, state or local agencies) that require reporting of sales and distribution data?

- No other entity in the United States requires the requested data.

- The Department of Energy requires recordkeeping of sales of central split system air conditioners for compliance with regional standards. However, this is only for central split system AC and does not apply to heat pumps or package systems, and there is no reporting requirement.
- 9. How detailed should reported information be about the type or model of equipment? Should equipment counts be grouped or aggregated by model family, size or capacity, or by some other factor? Why or why not?**
- The more details required by the reporting requirements, the more improper the requirements become.
- 10. How detailed should reported information be about the destination and purchaser/receiver of any equipment? Should sales to contractors record their contractor license number?**
- The detailed information required to be reported is improper to be requested due to private business data that is needed for each business.
- 11. How detailed should reported information be about when equipment was delivered?**
- Detailed information that only leads to improper sharing of private business data.
- 12. Should refrigerants used by reported units be specified? Why or why not?**
- Additional reporting information increases the cost of compliance. Each manufacturer has chosen refrigerants for use based on the class of equipment, with the majority using a single refrigerant across their air-conditioner and heat pump product lines. Reporting this information is unnecessary because the information is already publicly known.

Sincerely,

Ryan Kalmbach