

DOCKETED

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**Bradford White Corporation Comments to Energy Data Collection-
Phase 3**

Additional submitted attachment is included below.



August 18, 2025

California Energy Commission

Docket Unit

715 P Street

Sacramento, CA 95814

Submitted Electronically to: [<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=24-OIR-03>]

Re: Docket 24-OIR-03, Request for Information Energy Data Collection Phase 3 – Space Conditioning and Water Heating Equipment Data Tracking

Dear Docket Unit,

On behalf of Bradford White Corporation (BWC), we would like to thank you for the opportunity to comment on the California Energy Commission's (CEC) Request for Information (RFI) Energy Data Collection Phase 3 –Space Conditioning and Water Heating Equipment Data Tracking.

BWC is an American-owned, full-line manufacturer of residential, commercial, and industrial products for water heating, space heating, combination heating, and water storage. In California, a significant number of individuals, families, and job providers rely on our products for their hot water and space heating needs. We have compiled our comments on the CEC's RFI below:

General Comments

BWC appreciates the intent of this RFI, which is aimed at collecting data to better inform demand forecasts for energy throughout the state. A data collection of this magnitude, however, will require the State to amend the building permit process. Creating a data collection requirement involving manufacturers and subsequent supply chain (i.e., wholesalers, retailers, etc.) will not be able to answer the question of where the equipment is ultimately installed. Additionally, this approach is fraught with administrative challenges such as double counting and data reconciliation. As a manufacturer, we have limited influence or knowledge as to where a product will ultimately be installed after it is manufactured and a limited capability to control a product's final installation location. Lastly, we wish to emphasize that data such as model numbers, serial numbers, and any other product specific information is confidential business information that manufacturers keep very closely guarded. To that end, BWC believes the confidential business information from manufacturers, as described above, would not fulfill the CEC's granular data collection needs and improving energy demand forecasts can be accomplished effectively without it using building permit data containing installation information.

Responses to Questions

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

BWC believes that the data collection should involve the least number of reporting sources as possible.

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That being said, it should be noted that data collection, to the granularity that CEC desires, will be incredibly challenging and burdensome from any level of the supply chain. With this understanding in mind, we believe the best solution is to collect permit data from the local building jurisdictions throughout the state. This approach once again has its challenges, as it will require the State to amend the building permit system so that contractors and owner-builders are encouraged to pull permits. We believe contractors, like manufacturers, have concerns about the confidentiality of business information that competitors may use against them. Building permit information would provide granular information on what product was installed and its installation location, without disclosing contractor information. As we stated in our general comments, we believe this effort is necessary and provides the best path forward for the state to obtain accurate installation information.

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

As we stated in our response to #1, the data should be collected from the least number of reporting sources as possible, as multiple reporting entities as shown in the RFI's Reporting Content Table, may lead to double counting and create additional challenges reconciling data. The CEC should seek to identify a single reporting source (e.g., local building jurisdictions) that can provide relevant data with the necessary granularity to develop accurate demand forecasts.

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)?

The frequency of data collection should ultimately be negotiated between the CEC and the participants who the CEC is collecting data from. We believe collecting data annually would be more reasonable versus quarterly or monthly. Water heater sales typically fluctuate throughout the year. With multiple, new Department of Energy (DOE) efficiency regulations coming in the next four years, quarterly or monthly data may be highly skewed, as products become obsolete and new ones are introduced. In the next four years, collecting very granular data would likely result in inaccurate models.

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

Information, such as serial numbers, installation address, and/or permit numbers is not information manufacturers collect. To our knowledge, the best source for installation specific information is local building jurisdictions through the building permit process.

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?

As we outlined in our response to question #1, the most accurate source to determine the final installed location is the permit data. Sales data from wholesalers or retailers may not be very accurate as it only captures where a product is sold, not installed. Equipment flows through regional distribution centers once it leaves the factory and is then dispersed to wholesale branches based on the most efficient means to transport. Equipment that lands in a distribution center in California, may ultimately be shipped to wholesaler locations in surrounding States.

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?

A central data repository of this magnitude will be extremely costly to set up and maintain, which is why careful consideration should be given to collect data from the least number of sources. As previously mentioned in our responses, we feel the best source of information is building permits. The CEC should coordinate a statewide effort and work with local building jurisdictions to amend the

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building permit process.

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?

BWC has no comment on this question.

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?

BWC is unaware of any federal, state or local agencies that collect manufacturer sales data. To our knowledge, the only agency that collects installation specific data are building jurisdictions during the permitting process.

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?

BWC believes that the data collected should be anonymous, such that data cannot be traced back to any single manufacturer. The information collected could be based on information in the required Title 24 Compliance Forms. Since all water heating being sold into the state meets Title 20 efficiency requirements, assumed minimum efficiencies could be used. While we understand, and appreciate the CEC's intention to treat confidential business information as such, we remain highly concerned about the possibility of the unauthorized release of this information, even if not deliberate.

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?

BWC believes that to reduce burdens on all levels of the supply chain, and obtain the information CEC seeks, any data collected should be obtained from existing sources (e.g., information contained in building permits), and not new data points. While it may prove to be a useful enforcement mechanism for licensing or permitting, requiring the sale of equipment to be tied to a contractor's license number will not aid in determining the final location of the equipment. Furthermore, water heaters can be installed by owner-builders who purchase equipment from a retailer without a contractor's license. For these reasons, we do not believe that requiring licenses to be reported with the sale of equipment will aid the CEC in creating accurate demand forecasts.

11. How detailed should reported information be about when equipment was delivered?

BWC does not believe information regarding equipment delivery is relevant to improving energy demand forecasts.

12. Should refrigerants used by reported units be specified? Why or why not?

BWC does not believe refrigerants are necessary to report on for water heating equipment. The market share of heat pump water heaters (HPWH) is very small, and regardless of the refrigerant used, equipment must meet minimum federal efficiency standards. Furthermore, the primary purpose of this RFI is to collect data to assist the CEC in developing an accurate demand forecast of energy use and collecting information on refrigerant type would not be required to develop an accurate energy demand forecast. Absent any reasoning from CEC as to why this information is necessary for their demand forecasting efforts, the Commission should not seek this information.

BWC thanks the Energy Commission for the opportunity to comment and we look forward to continuing to work with the Energy Commission on this important issue.

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Respectfully Submitted,

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