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American Supply Association Comments CEC RFI Docket# 24-OIR-03

Additional submitted attachment is included below.



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August 18, 2025

California Energy Commission
Docket Unit
Re: Docket 24-OIR-03
715 P Street
Sacramento, CA 95814

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

To Whom It May Concern:

The American Supply Association (ASA) respectfully submits the following responses to questions presented by the California Energy Commission's (CEC) Request for Information (RFI) Energy Data Collection Phase 3 –Space Conditioning And Water Heating Equipment Data Tracking – Docket Number #24-OIR-03.

ASA is the national trade association for the Plumbing-Heating-Cooling-Piping (PHCP) and Pipes-Valves-Fittings (PVF) industry. Our distributor, wholesaler, and manufacturer members employ approximately 350,000 people across all 50 states and Puerto Rico together generates \$80 billion in annual revenues.

Thank you for the opportunity to respond to the CEC's RFI. While we recognize the importance of comprehensive data collection, the proposed scope would impose an undue burden on all our members, especially the smaller California firms operating one or two branches with fewer than 25 employees. We look forward to sharing our industry insights below.

Data Reporting Logistics

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

When water heating equipment leaves the factory, manufacturers lose visibility into its destination and cannot determine which units end up in California. Distributors

and wholesalers focus on transportation efficiency, so OEM-level data becomes isolated in unconnected silos. Since neither manufacturers nor distributors track installations, ASA regards upstream reporting as the least effective method for capturing accurate equipment information. Collecting reliable data at every supply-chain tier is inherently difficult.

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

ASA would oppose such requirements. Requiring manufacturers, distributors, and wholesalers to file redundant reports on every water-heating unit (even those that never enter California) would impose substantial administrative burdens without improving compliance. Inflated equipment counts would drive up consumer costs and undermine the accuracy of energy forecasts. Moreover, if the objective is energy forecasting, utilities already compile this information within their service territories.

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)?

ASA recommends that any required reporting be aggregated on an annual basis rather than broken down into fragmented data. We question the overall benefit of mandating such detailed submissions, but if reporting is imposed, it must be the simplest, least burdensome method for employers and employees. A straightforward annual report minimizes administrative overhead and avoids unnecessary complexity.

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

Distributors and wholesalers today lack the infrastructure to capture and retain the level of detail California's proposal demands. Adding fields for capacity or tonnage would force a complete overhaul of enterprise resource planning software. This would be an initiative that is both costly and time-consuming. Even after investing in system redesign, accurately locating each installed unit would remain difficult. In practice, any classification beyond today's standard practices would require building new databases and hiring additional staff and still leave substantial data gaps.

Moreover, requiring the CEC to report equipment shipments would not provide an accurate picture of actual energy use. Consumption depends on final system configuration and end-user behavior, factors that contractors determine when pairing components on site. Distributors, wholesalers, and manufacturers have no visibility into those on-site assemblies.

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?

Tracking the journey of a unit from shipment to its ultimate installation cannot achieve pinpoint accuracy. Once products enter national distribution networks, manufacturers have no way of knowing which specific units will end up in California, and distributors face the same uncertainty about final destinations.

As a result, any attempt to report delivery locations with finer detail than state or county level will yield unreliable data. The existing supply chain simply doesn't support geographic precision beyond those broad boundaries.

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?

The introduction of a mandatory reporting requirement would impose significant financial and administrative burdens across all tiers of the supply chain. Stakeholders' capacity for electronic compliance will vary widely, influenced by disparities in technological infrastructure, staffing, and financial resources. Manufacturers, distributors, and the State of California would each incur substantial overhead expenditures associated with recruiting qualified personnel and developing a centralized data management system tailored to the CEC's specifications.

Such mandates would disproportionately affect small businesses, many of which lack internal resources to absorb these costs. To meet compliance demands, they may be forced to hire additional staff or engage third-party service providers. These are decisions that could compromise operational stability and long-term viability. In

addition, consideration must be given to the economic consequences of this proposal to ensure fair implementation without undermining the resilience of smaller businesses.

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?

As previously noted, the proposed mandates would inadvertently affect small and even midsized businesses negatively. It would require them to hire additional staff, retain third party service providers and a significant cost in purchasing or committing resources to technology that they may not have.

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?

At present, we are not aware of any federal, state, or local government agency that systematically gathers comprehensive sales and distribution data on water heaters or heat pumps.

Separately, the U.S. Department of Energy's (DOE) Regional Technical Standards Program, contractors, distributors, and manufacturers of specified Heating-Ventilation-Air Conditioning (HVAC) equipment must comply with limited recordkeeping requirements. These obligations include documenting serial and model numbers, manufacturing and sale dates, and purchaser contact information. These records must be retained for five years.

However, this data is not proactively submitted to the DOE. Instead, stakeholders are required to furnish records only upon request, with a 30-day response period. Federal data collection remains narrowly focused, covering only a small subset of products at any given time.

Data Reporting Content

- 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?**

We strongly recommend that the collection of serial numbers and original equipment manufacturers' model numbers be excluded from any reporting requirements. This information constitutes confidential business data, and its inclusion would impose an undue administrative burden on stakeholders across the supply chain.

Furthermore, the collection of such granular product identifiers does not contribute meaningfully to the estimation of building load, which is central to accurate electrical grid forecasting. For these reasons, the exclusion of this data is both a prudent and practical approach to ensure policy effectiveness without compromising commercial integrity or operational efficiency.

- 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?**

We firmly oppose any requirement mandating the disclosure of installation addresses, as doing so would compromise sensitive customer information and raise significant privacy concerns. This level of detail is not only unnecessary, but also introduces considerable risks related to data security and consumer trust.

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

Reporting protocols should be streamlined and transparent. Each data element requested must be clearly tied to a defined business objective and demonstrate direct relevance to the policy goals it intends to support. This approach not only enhances efficiency and compliance but also fosters trust among stakeholders by ensuring that every reporting requirement is purposeful, justified, and minimally burdensome.'

Conclusion

ASA urges the Commission to adopt data-collection strategies that generate actionable insights without placing undue strain on the supply chain. Streamlined online permitting, targeted field enforcement, and enhanced contractor education can produce more reliable compliance data at a fraction of the cost and complexity of an extensive, fragmented sales registry.

We appreciate the opportunity to comment and stand ready to collaborate with CEC staff on solutions that advance California's energy forecasting and decarbonization goals while aligning with the operational realities of the water heating marketplace.

ASA thanks the Commission for considering these responses. Please feel free to contact me directly for any additional information or questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Rossi'.

Stephen Rossi
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