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Comment Received From: Kathy Jaw
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Response to Request for Information Energy Data Collection Phase 3

Additional submitted attachment is included below.

August 18, 2025

Mr. Peter Strait
Commission Staff
California Energy Commission
715 P Street
Sacramento, California 95814
docket@energy.ca.gov

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

Dear Mr. Strait:

California Air Resources Board (CARB) staff appreciate the opportunity to respond to the California Energy Commission's (CEC) Request for Information regarding the development of energy data collection regulations for space conditioning and water heating equipment. We support the CEC's efforts to enhance data accuracy to support effective energy policy and program development. Accurate data on heating equipment attributes and sales would improve CARB's ability to enforce existing regulations and develop new ones to help meet our state's climate and air quality goals.

Since 2022, CARB has been engaging with the public and researching regulatory pathways for reducing climate and criteria pollution emissions from the building sector through zero-emission space and water heater standards. CARB's 2022 State Implementation Strategy for attaining federal ozone standards included zero-emission space and water heating regulations. Failure to attain federal ozone standards as outlined in the Clean Air Act, which aims to protect the public from the harmful effects of air pollution, may potentially subject the state to sanctions, including loss of highway funds, as well as imposition of a federal implementation plan. CARB staff appreciate the CEC's goal of creating a state-level data source that is usable by other state and local agencies, which can improve consistency and eliminate redundancy for reporting entities. CARB staff would like to leverage CEC's energy data collection of space conditioning and water heating equipment sales trends to inform the development and implementation of zero-emission space and water heating standards. CARB staff anticipate requiring similar reporting to understand progress toward heating equipment emission reduction goals, so would like to closely coordinate with you to ensure that our requirements are aligned and streamlined wherever possible.

Recognizing that manufacturers often lack information on the final installation location of their equipment, CARB encourages the CEC to pursue focused data collection requests from manufacturers, distributors, and large retailers to trace the sale and installation of equipment. This data would offer the transparency necessary to track progress toward zero-emission

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heating goals, as well as insights into the spatial distribution of zero-emission heating technologies, which can help state agencies better understand regional trends and evaluate the reach of incentives and other supportive programs.

By coordinating with the CEC, CARB hopes to benefit from the market insights this data collection will generate, use this information to develop thoughtful and feasible regulations, and streamline regulatory compliance and avoid redundant data collection. Thank you again for your efforts. We look forward to continuing to strengthen our coordination.

If you have any questions, please contact Pamela Gupta, Branch Chief, Building Decarbonization, Sustainable Transportation and Communities Division.

Sincerely,

Annalisa Schilla

Annalisa Schilla, Acting Division Chief for the Sustainable Transportation and Communities Division at the California Air Resources Board

cc: See next page.