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*Comment Received From: Rick Martin  
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## **I respectfully urge the California Energy Commission to abandon the proposed sales registry**

My name is Rick Martin, and I am a Mechanical Contractor based in Napa, California. Our company has 75 employees, and we work every day to provide safe, efficient HVACR and water heating services to homeowners and businesses. I appreciate the chance to comment on the California Energy Commission's proposal to create a statewide HVACR and water heater sales registry.

While I fully support responsible installation practices and efforts to improve permit compliance, I am concerned that the proposed registry would place significant burdens on legitimate businesses without delivering meaningful benefits.

First, the registry would create major new administrative tasks. Contractors and distributors already manage complex scheduling, purchasing, permitting, rebate documentation, and customer service. Requiring us to report every unit sale into a state database adds yet another layer of paperwork. For small and mid sized companies, even a small administrative increase can slow operations and add stress to already limited staff resources.

Second, the registry would inevitably lead to added costs from employee time to software adjustments to potential compliance audits. These expenses provide no direct benefit to customers or businesses and come on top of existing regulatory pressures.

Third, the proposal raises real concerns about protecting confidential business information. Sales volumes, transaction details, and customer data are sensitive and competitive. Even with security measures, a statewide database creates exposure risks that businesses should not be forced to accept.

Finally, the registry does not address the real causes of permit non compliance. Reporting unit sales will not ensure homeowners pull permits or stop unlicensed operators. More effective solutions include simplifying permits, educating consumers, and improving enforcement where it matters.

For these reasons, I respectfully urge the California Energy Commission to abandon the proposed sales registry and work with industry partners on more practical, effective ways to improve compliance and support energy goals.

Thank you for the opportunity to comment.

Sincerely,

Rick Martin