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I respectfully ask the California Energy Commission to abandon this proposal

Thank you for the opportunity to provide public comment on the proposed HVACR and water heater sales registry. I appreciate the Commission's ongoing efforts to improve energy efficiency, safety, and compliance across California. I share the goal of ensuring that equipment installations are performed properly and permitted when required.

I am a California-based contractor located in Fullerton. My business employs approximately 9 employees. We serve residential customers and work closely with homeowners, local building departments, manufacturers, and utilities to deliver reliable and compliant systems. Based on our day-to-day experience in the field, I respectfully oppose the proposed registry and urge the Commission to abandon this approach.

The proposed registry would add a significant administrative burden to businesses like mine. HVAC work already involves extensive documentation, including load calculations, equipment selection, rebate paperwork, permitting, inspections, manufacturer requirements, and customer communication. Adding a state-level sales registry would require additional data entry, tracking, reconciliation, and error correction for every qualifying transaction.

For small businesses, this work would fall on owners, office staff, or technicians—people whose time is already stretched thin. Each new reporting requirement may seem manageable in isolation, but together they create real operational strain. Time spent navigating another system is time taken away from customer service, technician training, and quality workmanship.

Added costs that will be passed to customers

The registry would create new costs for businesses, including staff time, software integration, training, compliance monitoring, and potential legal or accounting support. These costs do not disappear; they are ultimately passed on to customers through higher prices.

California homeowners are already facing rising costs for housing, utilities, insurance, and home repairs. Increasing the cost of essential HVAC and water heater replacements—often done in emergency situations—will make it harder for customers to replace failing or unsafe equipment promptly. This could unintentionally encourage delays or push consumers toward unlicensed or underground work, which runs counter to the Commission's goals.

Another major concern is the handling of confidential business and customer information. A centralized registry would require contractors and distributors to submit sensitive data, potentially including sales volumes, pricing structures, customer addresses, and equipment details.

Even with safeguards, centralized databases present risks. Data breaches, misuse, or mission creep are real concerns for small businesses that have limited ability to manage or respond to such risks. This information is proprietary and competitively sensitive, and its collection by a state agency raises serious questions about data security, access, and long-term use.

Most importantly, the proposed registry does not address the root causes of permit noncompliance. In our experience, lack of permitting is driven by factors such as inconsistent local enforcement, unclear requirements, customer resistance to added costs or delays, and limited resources at local building departments.

A sales registry does not ensure that a permit is pulled, inspections are completed, or installations meet code. It simply records that equipment was sold. A transaction recorded in a registry does not guarantee proper installation, nor does it meaningfully assist local jurisdictions in enforcement. Instead, it risks creating the appearance of oversight without delivering real compliance improvements.

If the Commission's goal is to improve permit compliance and installation quality, there are more effective and less burdensome approaches. These include supporting local building departments with funding and staffing, standardizing permit requirements across jurisdictions, improving consumer education about why permits matter, and strengthening enforcement against bad actors rather than imposing new requirements on compliant businesses.

Partnerships with contractors, distributors, and manufacturers could also yield better results through training, incentives, and streamlined processes. These solutions focus on outcomes rather than paperwork and recognize the practical realities of how work is performed in the field.

I respect the Commission's mission and the complexity of balancing energy policy, safety, and economic impacts. However, from the perspective of a California-based business employing local workers and serving local communities, the proposed HVACR and water heater sales registry would increase administrative burden, raise costs, expose sensitive information, and fail to achieve its stated purpose.

For these reasons, I respectfully ask the California Energy Commission to abandon this proposal and instead work collaboratively with industry stakeholders on solutions that are effective, targeted, and practical.

Thank you for considering my comments and for your continued engagement with the businesses and workers who implement California's energy policies every day.

Sincerely,

Rose Martinez