

DOCKETED

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

Additional submitted attachment is included below.



February 13, 2026

Peter Strait
California Energy Commission
715 P Street
Sacramento, California 95814
Submitted Electronically to: [[California Energy Commission : e-comment : Submit Comment](#)]

Re: Docket # 24-OIR-03 Request for Information (RFI) Space Conditioning and Water Heating Equipment Data Tracking Second RFI on Draft Express Terms

Dear Mr. Strait,

On behalf of Bradford White Corporation (BWC), we would like to thank you for the opportunity to comment on the Docket # 24-OIR-03 second RFI and the January 9, 2026, workshop regarding space conditioning and water heating equipment 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. We are proud to have made our own significant investments in products that provide substantial energy conservation and environmental benefits, such as ENERGY STAR®-certified electric heat pump water heaters. As a testament to our efforts, we have been recognized as an ENERGY STAR Partner of the Year for five consecutive years. In California, a significant number of individuals, families, and job providers rely on our products for their hot water and space heating needs.

General Comments

BWC appreciates that the California Energy Commission (CEC) is undertaking a renewed focus on quality water heating installations that save consumers money. We have a unique business model where we only sell the products we manufacture to wholesale distributors, who in turn sell to licensed contractors at wholesale locations. By ensuring our products are purchased and installed only by trained and licensed contractors, it is our experience that this results in fewer field issues and a more satisfied end user. While our business model may align with some of the goals the CEC has set forth in this proceeding, we maintain that the collection of equipment data from manufacturers, as proposed, would not aid in improving compliance, or improve energy demand forecasts, and ultimately would place a significant burden on manufacturers and our wholesale distributor partners.

In our response to Docket # 24-OIR-03 Request for Information (RFI) Space Conditioning and Water Heating Equipment Data Tracking dated August 25, 2025, we commented that the proposal fell short of providing information on where equipment was ultimately installed. We additionally emphasized that data requested, such

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as equipment serial numbers associated with equipment purchased by wholesale distributors is confidential business information. If this data were to be exposed to the public, even if unintentionally, it would severely compromise a manufacturer's and wholesale distributor's business.

As an alternative to the proposed data collection, we discussed the need to revamp the building permitting system, so that it creates a streamlined pathway for contractors and building owners to comply with state and local laws. A robust building permit system would also provide the CEC with site level data to improve compliance and forecasting. This approach was echoed by other industry members yet was not reflected in the Title 20 Express Terms. We understand that the collection of data falls within the authority granted to the CEC by the State while regulating building permitting may not be. With that being said, if the CEC strongly believes that collecting equipment sales data is necessary to improve compliance and improve energy demand forecasts, then we encourage the Commission to collect that data as close to the end user as possible. Due to how water heaters are typically sold, most in the distribution channel do not know where a water heater will ultimately be installed, let alone if it will even stay in the state of California.

The State's Integrated Energy Resource Plans (IRP) provide a roadmap for the State and the utilities who provide electricity to the people who live in the State. These plans forecast electricity demand based on historical data and growth trends and are required to be submitted by utilities at least every five years. Each utility has its own resource needs and within a utility territory needs may vary dramatically based on factors such as climate zone, population density, and local economy. Having site level data, capturing the space and water heating equipment used throughout each utility's territory is crucial for accurate forecasting. Collecting sales data from a manufacturer's production facility to a wholesale distributor's warehouse or retail distributor's warehouse simply does not provide the level of detail needed to improve the forecasting in IRPs. Manufacturers do not know where their products are installed, we only know the wholesale distributor or retail distributor we ship product to. Wholesale and retail distributor locations are simply put, temporary storage warehouses, where products await to be dispatched to local wholesale and retail locations to be sold to a contractor or end user.

Equipment Supply

Manufacturers build products in response to customer demand and ship those products to our customers (i.e., wholesale distributors and retail distributors). Once our products leave the factory, we have little to no visibility beyond the wholesale distributor or retail distributor we ship to. We generally do not have data as to where the products are ultimately sold and who purchased them. Wholesale and retail distributors, in practice, operate as warehouses that ship product to local wholesalers or retailers to be sold to contractors and consumers. Many wholesale and retail distributors are not located within California, yet are able to ship to California, as well as other states. Wholesale and retail distribution centers are designed to efficiently warehouse and ship product to local wholesalers and retailers, not sell directly to contractors and consumers. Collecting the sales information from a manufacturer to wholesale and retail distributors will not provide any meaningful information beyond a warehouse location that equipment goes to after leaving the factory. The collection of this information would also lead to several reconciliation challenges for the CEC including:

- Wholesale and retail distributors located in California shipping to wholesale and retail locations in other states;
- Wholesale and retail distributors in other states shipping to wholesale and retail locations in California,
- Wholesale and retail distributor branches in neighboring states (e.g., Oregon, Nevada, Arizona) and/or nearby states selling product for installation in California, and vice versa;
- Wholesale and retail distributors selling or transferring product from wholesale or retail branches geographically different than the final installation location (e.g. northern California to southern California); and
- Local wholesale locations branches selling product to other wholesale or retail locations.

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With these challengers in mind, and manufacturer shipments to wholesale and retail distributors far removed from the end point of sale, BWC believes sales data from the manufacturer would not fulfill the CEC's data collection purpose of improving energy demand forecasts and improving compliance with state and local laws. Furthermore, we believe, for the same reasons outlined above, the data requested of wholesale and retail distributors would not fulfill the needs of the CEC and may even increase burdens for the Commission by causing confusion.

Ultimately, the data needed to fulfill the CEC's goals of improving energy demand forecasts and improving compliance with state and local laws needs to come from the contractor and/or consumer purchasing equipment for installation in California. Equipment sold from a manufacturer to a wholesale or retail distributor and from a wholesale or retail distributor to a wholesale or retail location, will not provide meaningful data at a localized level such that it can be used to improve utility electricity demand forecasts.

Alternative Approach

The California Air Resources Board (CARB) released a proposed concept for transitioning the state to zero-emission space and water heaters. Their proposal included similar data collection to this current CEC proposal: collecting sales information from manufacturers. As we've explained above, manufacturer data will not help the CEC or CARB meet their stated objectives. We responded to CARB stating that the collection of manufacturer sales data and enforcing fleet targets for equipment sales would not change consumer behavior and would simply drive up the cost of equipment.

The goals set forth by the state legislature in the Clean Energy and Pollution Reduction Act, Senate Bill 350¹, are very clear: multiple agencies must work closely together, and strategies must be deployed to meet these goals. We believe our proposal to CARB, dated January 21, 2026, can accomplish the goals of both CARB and the CEC.² Our proposal focuses on establishing a long-term funding mechanism and addresses equipment tracking to encourage a shift in consumer behavior, while reducing the burden on manufacturers and wholesale and retail distributors. Our proposal is consumer-oriented with a focus on lowering the cost of equipment purchase and installation, while simultaneously creating a data registry to collect accurate data of each space and water heater product installed in the state. We believe this data will be helpful to the CEC addressing the goals stated in this proceeding.

We respectfully request the CEC to consider our comments above and evaluate our alternative proposal to CARB before moving forward with final rule language in Title 20. BWC believes that our alternative proposal would help make a greater impact on emission reductions, compliance, and energy demand forecasting in California than what is currently proposed.

BWC appreciates the opportunity to comment, and we look forward to continuing our collaboration with the CEC on this important rulemaking.

Respectfully Submitted,

Bradford White Corporation

¹ [Clean Energy and Pollution Reduction Act - SB 350](#)

² [Zero-Emission Space and Water Heater Standard December 11, 2025 Workshop - Public Comments: Submission #8262 | California Air Resources Board](#)

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