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AHAM Comments on 24-OIR-03

Additional submitted attachment is included below.

February 13, 2026

Submitted electronically

Mr. David Hochschild
Chair
California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814

Re: AHAM Comments on CEC's Second Request for Information on Space Conditioning and Water Heating Equipment Data Tracking; Docket No. 24-OIR-03

Dear Mr. Hochschild:

The Association of Home Appliance Manufacturers (AHAM) respectfully submits the following comments to the California Energy Commission (CEC or the Commission) on its Second Request for Information (RFI) on Space Conditioning and Water Heating Equipment Data Tracking; Docket No. 24-OIR-03 (December 22, 2025).

AHAM appreciates the opportunity to comment on the Second Request for Information regarding Space Conditioning and Water Heating Equipment Data Tracking. We urge the Commission to exclude room air conditioners from this data collection. AHAM questions CEC's legal authority to collect this information from room air conditioner manufacturers in the first place. Furthermore, not only is most of this data already collected at the federal level, but the proposed data collection is overly burdensome and, in many cases, impossible to obtain for the following reasons:

- Room air conditioner manufacturers often do not have specific product information such as individual unit serial numbers and quantity sold into specific states.
- Quarterly reporting is overly burdensome and inconsistent with federal reporting requirements.
- The requested product specific information is in many cases, sensitive information that manufacturers are unauthorized to share.
- Any public release of this data should be in both aggregated and anonymized form.

I. AHAM Questions CEC's Legal Authority to Require Room Air Conditioner Manufacturers To Submit This Information.

CEC must be certain not to exceed its statutory authority in this rulemaking. While CEC is obligated to "conduct assessments and forecasts of all aspects of energy industry supply,

production, transportation, delivery and distribution, demand and prices,”¹ that obligation does not grant CEC the authority to force this very wide-ranging group of entities to provide such sensitive information with the intent of permit compliance. CEC’s RFI fails to clearly connect this proposed reporting mandate to its stated problem of oversight and accountability in HVAC installation or its authority to conduct energy demand forecasts. The underlying objective of this RFI appears to be the development of a centralized and invasive monitoring system, which is far outside the CEC’s regulatory authority and would impose substantial and unnecessary burden on manufacturers.

Such authority would require legislative action. In fact, SB 795 from the 2023-2024 legislative session sought to require CEC to develop and implement an electronic statewide heating, ventilation, and air-conditioning equipment sales registry and compliance tracking system but was not enacted. The fact that there was a failed legislative effort to provide CEC with this exact authority it would need to collect the data it seeks, demonstrates CEC does not currently have that authority. Thus, CEC’s claim that it already has that authority is bad faith.

II. Room Air Conditioners Should Be Excluded From The Scope Of The Proposed Data Collection.

AHAM supports CEC in its efforts to pursue energy efficiency improvements for California residents. In this case, however, it does not make sense for room air conditioners to be included in the scope of the Space Conditioning and Water Heating Equipment Data Tracking proposal because room air conditioners are already covered by federal reporting requirements and because they are very different from building-installed space heating and conditioning devices, which are the primary focus of this RFI.

Room air conditioner manufacturers are already subject to federal reporting requirements, and CEC can readily access that information. AHAM commends CEC for its ongoing efforts to harmonize energy efficiency standards with the Department of Energy (DOE) to the greatest extent possible. One way CEC can work toward that goal is not to require reporting beyond what is already submitted at the federal level. Different reporting requirements for California and DOE and/or ENERGY STAR adds unnecessary burden without a benefit to consumers. CEC’s proposal to require quarterly reporting is inconsistent with federal reporting requirements.

Furthermore, even if CEC had authority to collect this data, it cannot collect what manufacturers do not have. Not only is CEC’s proposal to require individual serial numbers and quantity sold into California *far* beyond existing federal reporting requirements, but it also does not take into account that room air conditioners are unique from several building-installed space heating and conditioning devices because they are typically sold through distributors or direct-to-consumer. In the case of sale via distributor, room air conditioner manufacturers would not have the specific unit serial number available to meet CEC’s proposed reporting requirement. And CEC cannot require third parties to provide that data.

¹ Public Resources Code 25301(a)

Furthermore, in the second RFI, CEC proposes to collect data unnecessary to address the stated goal—which is to develop an accurate determination of the numbers and types of building-installed space heating, space conditioning, and water heating devices that are sold, installed and delivered within California and address challenges with permitting compliance. AHAM strongly opposes CEC collecting sensitive data, especially buyer information, as many room air conditioners are sold direct to consumer, and manufacturers are not legally authorized to share consumers' personally identifiable information with CEC. CEC should not collect the proposed data for room air conditioners and broadly should ensure that its data collections are restricted to data necessary for its stated purpose.

Aside from the problematic personally identifiable information that has been noted above, CEC is also proposing the collection of confidential business information that must be closely protected and aggregated to avoid that information being distributed or dissected by bad actors. While CEC provides assurances that received data will be anonymized prior to any public release, AHAM urges the Commission to ensure that sensitive data is both anonymized and aggregated before any public release.

AHAM appreciates the opportunity to submit these comments on CEC's Second Request for Information on Space Conditioning and Water Heating Equipment Data Tracking and would be glad to discuss these matters in more detail should you so request.

Respectfully Submitted,



Meredith Birkhead
Regulatory Affairs Manager

About AHAM: AHAM represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives. The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly \$200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than \$50 billion.