

**DOCKETED**

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<b>Project Title:</b>	Energy Data Collection - Phase 3
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*Comment Received From: William Critchfield*  
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*Docket Number: 24-OIR-03*

## **Docket number 24-OIR-03 - Energy Data Collection - Phase 3**

Dear Re: Docket 24-OIR-03 Docket Unit,

I am a California-based HVACR contractor in Southern California, employing 17 technicians and office staff. We serve light commercial customers and already manage significant administrative responsibilities, including permits, inspections, safety documentation, and warranty registrations.

The proposed HVACR and water heater sales registry from the California Energy Commission would add another layer of reporting and tracking to our daily workflow. This means additional office time entering equipment data, verifying serial numbers, and managing compliance tasks that do not directly improve installation quality or customer service. For a small business like ours, that translates into higher labor costs, potential software upgrades, and reduced field productivity. Those costs will ultimately be passed on to our customers.

We are also concerned about the handling and protection of confidential business information, including customer details and sales data. Any centralized registry creates risk if data security is compromised.

Most importantly, a sales registry will not solve permit compliance challenges. Enforcement of existing permit requirements—*not* additional reporting—would be more effective.

I respectfully ask the California Energy Commission to abandon this proposal and instead work collaboratively with contractors and distributors on practical solutions that support compliance without creating unnecessary burdens.

Sincerely,

William Critchfield