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Commissioners re: Docket 24-OIR-03,

As an HVACR distributor operating in California, I'm writing to urge the Commission to reject the proposed requirement for unit-level sales reporting and instead adopt HARDI's proposed aggregated-data alternative.

Requiring distributors to report detailed, unit-level sales data would add significant new administrative burden â€” additional recordkeeping, reporting systems, and staff time â€” without a clear benefit to the Commission's stated energy-planning goals. It would also mean turning over sensitive, competitively significant business information (customer purchasing patterns, sales volumes, pricing behavior) to a state registry, raising real confidentiality concerns for distributors of every size, but especially smaller and mid-sized companies with fewer resources to manage new compliance obligations. Just as importantly, unit-level sales tracking is not an effective tool for improving permit compliance. Sales data reflects what distributors sell, not what contractors ultimately install or whether a permit was pulled â€” so this registry would create burden without solving the underlying compliance gap the Commission is trying to address.

HARDI's proposed alternative would give the Commission the aggregated market data it needs for energy planning purposes while protecting confidential business information and avoiding a new, costly reporting mandate. I urge the Commission to pursue that approach instead. Steve Amerino