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Commissioners re: Docket 24-OIR-03,

I am a California based HVAC Distributor with thirteen warehouse locations in California spread from San Diego to Redding. I am opposed to the CEC proposed sales registry for the following reasons:

This will cost Distributors a significant amount to get set up to provide this reporting and these costs will be added to the cost of the product. This will increase the installing contractor's cost which in turn will increase the consumer's cost on products that are already too costly due to regulatory changes.

I am also concerned about the integrity of the reported data. Should the State's database get compromised many distributors and contractor's businesses could be irreparably harmed.

A better approach would be to adopt HARDI's proposed alternative that would provide the CEC with the market data it is seeking while also protecting California businesses confidential information. Layne Miller