

DOCKETED	
Docket Number:	24-OIR-03
Project Title:	Energy Data Collection - Phase 3
TN #:	271617
Document Title:	The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) Comments - AHRI Comments on Energy Data Collection - Phase 3; Docket Number 24-OIR-03
Description:	N/A
Filer:	System
Organization:	The Air-Conditioning, Heating, and Refrigeration Institute (AHRI)
Submitter Role:	Public
Submission Date:	7/24/2026 3:10:29 PM
Docketed Date:	7/24/2026

Comment Received From: The Air-Conditioning, Heating, and Refrigeration Institute (AHRI)

Submitted On: 7/24/2026

Docket Number: 24-OIR-03

AHRI Comments on Energy Data Collection - Phase 3; Docket Number 24-OIR-03

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully submits the following

comments to the California Energy Commission's (CEC) Third Request for Information (RFI) Energy

Data Collection Phase 3 "Space Conditioning and Water Heating Equipment Data Tracking Docket

Number 24-OIR-03 (June 9, 2026).

Additional submitted attachment is included below.



2311 Wilson Boulevard Suite 400 Arlington VA 22201 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

Submitted via California Energy Commission Docket

July 24, 2026

Peter Strait
Manager of Appliance Efficiency Branch
California Energy Commission
Docket Unit, MS-4
Re: Docket 24-OIR-03
715 P Street
Sacramento, CA 95814

Re: Energy Data Collection – Phase 3; Docket Number 24-OIR-03

Dear Mr. Strait,

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) respectfully submits the following comments to the California Energy Commission's (CEC) Third Request for Information (RFI) Energy Data Collection Phase 3 – Space Conditioning and Water Heating Equipment Data Tracking Docket Number 24-OIR-03 (June 9, 2026).

AHRI represents more than 330 manufacturers of heating, ventilation, air conditioning, commercial refrigeration (HVACR), and water heating equipment. It is an internationally recognized advocate for the HVACR and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR and water heating industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 700,000 people.

Response to Draft Express Terms Proposal

The current RFI seeks feedback on potential data reporting requirements for air conditioning, water heating, and heat pump equipment delivered to installers. AHRI thanks the Commission for considering AHRI's previous comments and the exclusion of manufacturer-level and serial-number mandates from the draft Express Terms.

AHRI understands CEC's need for energy data objectives, including forecasting, incentive program design and evaluation, and regional permit compliance awareness. However, AHRI continues to oppose the CEC proposal that would collect direct state collection of customer lists, Original Equipment Manufacturer (OEM) or brand information, model-level sales information, and transaction-level sales records.

As an alternative, AHRI believes aggregated and anonymized data from industry data sources can satisfy CEC's policy needs. To achieve this, AHRI supports a third-party independent aggregator to receive, standardize, classify, validate, aggregate, and suppress underlying data.

AHRI continues to encourage CEC to review the other recommendations relating to space heating, space conditioning, and water heating equipment to address the permit compliance issue in

California, specifically the request to implement a statewide online permitting program.

The Commission should avoid highly granular data fields as they will generate enormous but disconnected datasets while diverting resources without improving permit compliance or providing an accurate picture of equipment installed in California. Finally, the program will yield far better results if it centers on proven, lower-cost tools: statewide online permitting, contractor education, consumer incentives for permitted, high-quality installations, and robust field checks. Applying these measures will meet the RFI's forecasting objectives while respecting the operational realities of the HVACR and water heating supply chain.

Scope Questions

1. Is the proposed language sufficiently clear and specific in communicating which sales must be reported? If not, how may it be improved?

AHRI recommends clarifying the definition of contractor in §1396.2 (b)(3). Language should be specifically included to the effect that homeowners who purchase equipment from a hardware store or "big box" store are captured in the definition of "contractor".

2. Should any other categories of equipment be included or excluded, and on what basis?

AHRI agrees that the scope of the Express Terms should remain aligned with the RFI and be limited to residential air-conditioning and water-heating equipment, including heat-pump equipment, and agrees with CEC's decision to exclude commercial equipment in this rulemaking.

Definitions Questions

3. Are the proposed definitions suitable and appropriate as written? Or, are there ways to improve the proposed language?

See AHRI comment on Question 1 above regarding the definition of contractor.

The Commission should consider clarifying §1396.1(c) and how the equipment categories apply to the list of residential equipment as identified in the bolded section below:

- (c) The reporting requirements of this Article shall apply to sales of the following residential equipment: central air conditioners, central air conditioning heat pumps, non-central air conditioners, non-central air conditioning heat pumps, storage water heaters, instantaneous water heaters, and heat pump water heaters, **including but not limited to single-package, single-split, mini-split, multi-split, and hydronic equipment.**

AHRI agrees with the reference to 10 CFR 430.2 in the water heater definition, §1396.2 (b)(11)(B).

4. Are there any additional terms used in the Scope or in subsequent sections that would be appropriate to define in regulation (e.g., where an ordinary understanding or dictionary definition would be vague or insufficient)?

See AHRI comment on Question 1 above regarding the definition of contractor.

Reporting Periods Questions

5. Does the proposed effective date provide sufficient lead time for successful completion and submittal of proposed Data Collection Reports? If not, what would be the basis for selection of an alternate initial calendar year?

As communicated in AHRI's August 18, 2025 and February 13, 2026 comments, AHRI recommends annual reporting. CEC should not require reporting until the first full calendar year beginning at least 12 months after CEC issues final reporting specifications. Alternatively, if an independent aggregator is contacted, CEC should also not require reporting until the first full calendar year beginning at least 12 months after approval.

6. Is there any specific data on costs, such as estimated salary or time to complete, that can be provided to inform or substantiate staff cost estimates?

AHRI has no comment on question 6.

Data to be Reported Questions

7. Is there a means of using model family groupings that would be appropriate to consider allowing instead of reporting more specific model numbers?

AHRI urges the CEC to reconsider explicitly excluding the collection of original equipment manufacturers' model numbers to protect confidential business information and avoid any unnecessary administrative burden. AHRI suggests water heaters to be reported consistent with the AHRI Directory of Certified Product Performance: Nominal Capacity, Input, Energy Source, Heater Type.¹

If CEC proceeds with a direct reporting pathway, model family or neutral categorical reporting should replace model-number reporting.

8. Is the language in subsection (b) specifying which sales are to be reported sufficiently clear and specific?

AHRI reiterates opposition to direct state collection of customer lists, OEM or brand information, model-level sales information, and transaction-level sales records. Reports should be simple. Each data point requested by CEC should reference the specific business purpose for the need and relevancy of that information.

9. Is the submitter self-identification language in subsection (c) sufficiently clear and specific?

AHRI has no comment on question 9.

Data Access Questions

10. Is the language relating to "masked, aggregated, or anonymized" records sufficiently clear

¹ www.ahridirectory.org

and specific?

AHRI has no comment on question 10.

11. Does the language in subpart (b) establish an appropriately high bar for data access?

AHRI has no comment on question 11.

Conclusion

AHRI again urges the Commission to pursue data collection methods that yield actionable insights without imposing disproportionate burdens on the supply chain. We appreciate the opportunity to provide these comments and remain ready to work with CEC staff on solutions that advance California's energy forecasting and decarbonization goals while respecting the operational realities of the HVACR and water heating marketplace.

Please do not hesitate to contact me directly if I can provide any further information or answer any additional questions.

Sincerely,

A handwritten signature in black ink that reads "Nicole Colantonio". The script is cursive and fluid, with the first name "Nicole" and last name "Colantonio" clearly legible.

Nicole Colantonio
Senior Director, Regulatory Affairs
Direct: (703) 600-0332
Email: ncolantonio@ahrinet.org