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Commissioners re: Docket 24-OIR-03,

Commissioners,

I am the owner of Airmaxx a licensed HVAC contractor serving San Diego County. I write to oppose the proposed data collection regulations as applied to contractors and other small sellers of space conditioning and water heating equipment.

1. The reporting burden falls hardest on small businesses. The proposed Express Terms would obligate sellers to track and report equipment transaction data. For a small contracting business, this means new recordkeeping systems, staff time, and compliance costs for every furnace, heat pump, air conditioner, and water heater we sell and install. Unlike manufacturers and large distributors, small contractors do not have compliance departments or enterprise software to absorb these requirements. These costs will be passed directly to homeowners at a time when HVAC replacement costs in California are already among the highest in the nation.

2. The data is duplicative of information the state already collects. Equipment installations requiring permits are already documented through local building departments, HERS registries (CHEERS/PIRS), and Title 24 compliance documentation. Utility incentive programs (TECH Clean California, self-generation and heat pump rebate programs) already capture detailed equipment data including make, model, and installation location. Layering a new seller-level reporting mandate on top of these systems collects the same information a second or third time while adding a new class of regulated entities.

3. The regulation risks discouraging permit compliance. Adding reporting obligations to legitimate, permitted equipment sales widens the cost gap between licensed contractors who follow the rules and unlicensed operators who do not. The practical effect is to push more of the market toward unpermitted work – undermining both the quality of installations and the accuracy of the very data the Commission seeks to collect. David Glozman