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Commissioners re: Docket 24-OIR-03,

I work for a California HVAC distributor that sells exclusively to licensed contractors. While I appreciate the Commission's efforts to narrow the proposal, I encourage you to adopt an aggregated reporting approach rather than requiring reporting on individual contractor sales.

As a distributor, we would be responsible for collecting, maintaining, and annually reporting detailed information for contractor purchases, including buyer identification, equipment make and model, month of sale, and quantity. Even with annual reporting, this creates additional administrative work, employee training, system changes, and ongoing compliance costs that ultimately provide little value beyond what aggregated reporting could achieve.

I also do not believe this proposal will substantially improve permit compliance. Whether a permit is obtained is determined by installation practices and enforcement, not by recording equipment purchases. Requiring distributors to report detailed sales information does not address the reasons permits are or are not pulled.

An aggregated reporting approach would still provide the California Energy Commission with meaningful market data for forecasting and policy development while reducing administrative burdens and protecting confidential business information.

Thank you for considering these comments. Amber Porras