

DOCKETED	
Docket Number:	24-OIR-03
Project Title:	Energy Data Collection - Phase 3
TN #:	271902
Document Title:	Tony Pulley Comments - Docket number 24-OIR-03 - Energy Data Collection - Phase 3
Description:	N/A
Filer:	System
Organization:	Tony Pulley
Submitter Role:	Public
Submission Date:	8/10/2026 12:43:01 PM
Docketed Date:	8/10/2026

Comment Received From: Tony Pulley

Submitted On: 8/10/2026

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Commissioners re: Docket 24-OIR-03,

I am a California-based contractor in Alpine, California and I am writing to respectfully oppose the proposed sales registry requirement. I support the alternative approach proposed by HARDI because it addresses permit compliance without creating unnecessary burdens for legitimate businesses.

The proposed sales registry would significantly increase paperwork, administrative time, and compliance costs for my business. As a small business, every additional reporting requirement takes time away from serving customers and completing projects. These added costs ultimately affect both contractors and consumers.

I am also concerned about the confidentiality of customer and business information that would be collected and stored through a sales registry. Protecting customer data is an important responsibility, and expanding the collection of sensitive information creates additional risks without providing clear benefits.

For small businesses like mine, this proposal would create a disproportionate compliance burden. Larger companies may have dedicated administrative staff, but many contractors and distributors operate with limited personnel. New reporting requirements would require additional resources that many small businesses simply do not have.

Most importantly, I do not believe this proposal will solve the permit compliance issue. Contractors who intentionally avoid obtaining permits are unlikely to be deterred by a sales registry, while law-abiding businesses will bear the additional administrative burden and expense. A better approach would focus on improving permit enforcement, education, and collaboration between contractors, distributors, and local jurisdictions, as outlined in HARDI's alternative proposal.

I respectfully ask that you reject the proposed sales registry and instead consider the alternative supported by HARDI. This approach would better promote compliance while avoiding unnecessary costs, protecting business and customer confidentiality, and reducing burdens on California's small businesses.

Thank you for your time and consideration.

Tony Pulley

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