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Commissioners re: Docket 24-OIR-03,

Add your messageDear Commissioner McAllister and Members of the California Energy Commission,

I'm the owner of Johnstone Supply Orion Group, a family-owned HVACR wholesale distribution business that's served California contractors since 1984. I am writing in response to the Commission's proposed equipment data-reporting requirements. While I recognize the value of better data for energy forecasting and electrification planning, I have real concerns with the rule as currently drafted.

Customer data doesn't belong with the state

The proposal would require distributors to send customer names, addresses, contractor identities, and detailed purchase records directly to the CEC. That information represents years of business relationships and is not something companies should be forced to hand over wholesale. Even with confidentiality protections in place, any transfer of this kind of data increases the risk of misuse, unauthorized access, or disclosure down the line. It also puts distributors in an awkward position with the very contractors who trust them to keep this information private.

The compliance cost is understated

Distributor systems weren't designed to produce this kind of report. Pulling together accurate, model-level, transaction-level data across inventory, sales, transfers, and returns would require significant IT work, new validation processes, and ongoing staff time, not a simple export. Every distributor runs a different system, so the burden and cost will vary widely and, in many cases, far exceed the Commission's current estimates.

A better path exists

I'd urge the Commission to adopt the alternative proposed by HARDI on July 8, 2026, which routes reporting through an independent, CEC-approved third-party aggregator. That aggregator would standardize and anonymize the data before it reaches the state, giving the CEC what it needs for policy purposes without exposing individual companies' customer and sales records. At a minimum, the Commission should adopt HARDI's safe-harbor provision, open to any qualified aggregator, so companies reporting through an approved third party are considered compliant.

I ask the Commission to revise the rule so that confidential, transaction-level data is never collected or held directly by the state. This protects California businesses and their customers while still giving the CEC the aggregated information it's after.

Thank you for your consideration. Christi Kalmbach