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Commissioners re: Docket 24-OIR-03,

I am the Regional Sales Manager for CFM Equipment Distributors, working alongside HVAC contractors throughout Northern California. Every day, I see firsthand the pressure these businesses face as they work to serve homeowners, support employees, control costs, and remain profitable.

I respectfully oppose the proposed detailed equipment sales tracking requirements.

Let me be clear: our industry is not opposed to providing useful information to the State of California. We are opposed to creating an expensive, complicated reporting system that collects sensitive contractor purchasing information without solving the underlying permit-compliance problem.

The proposal would require distributors to report detailed information, including equipment brand and model, the buyer's name and billing address, contractor license or business identification number, month of purchase, and quantities purchased.

That level of reporting would require distributors to build new systems, dedicate employee time, reconcile returns and corrections, verify customer information, and assume additional compliance risk. Those costs will not disappear. They will move through the supply chain and ultimately affect contractors and California homeowners.

Detailed sales data also does not establish where equipment was installed, who installed it, or whether a permit was obtained. Contractors routinely purchase equipment for inventory, future projects, emergency replacements, canceled jobs, transfers between locations, or orders that are later returned.

A sales transaction is not an installation record, and it should not be treated as one.

The proposal also exposes reporting entities to potential civil penalties for late or willfully inaccurate submissions. This places additional risk on responsible companies attempting to reconcile thousands of transactions across multiple branches, systems, credits, returns, and corrected orders.

There is a better path.

I support HARDI's practical, aggregated reporting approach. It would provide the CEC with meaningful market data while protecting confidential business information, customer relationships, and the ability of distributors and contractors to compete fairly.

Please reject detailed buyer-level and unit-level sales tracking and adopt an aggregated reporting solution developed in partnership with the HVACR industry.

California can achieve its energy objectives without creating another costly administrative burden for the businesses and skilled tradespeople responsible for keeping Californians safe and comfortable.

We are ready to be part of the solution. We are simply asking the CEC to choose a solution that actually works.

Thank you for considering the real-world impact of this proposal. Joe Antekeier