

DOCKETED

Docket Number:	22-DATA-01
Project Title:	Energy Efficiency Program Data Collection from Non-Utility PACE Programs - Annual Reporting
TN #:	266808
Document Title:	CEC Response to PACE Funding Group's Application for Confidentiality
Description:	Response to TN 265984
Filer:	Marianna Brewer
Organization:	California Energy Commission
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October 23, 2025

Via Email

Rachel Hobbs
PACE Funding Group LLC (dba Home Run Financing)
750 University Avenue, Suite 140
Los Gatos, CA 95032
rachel@homerunfinancing.com

**Application for Confidential Designation for Energy Efficiency Program Data
Collection from Non-Utility PACE Programs
Docket No. 22-DATA-01**

Dear Rachel Hobbs:

The California Energy Commission (CEC) has received PACE Funding Group LLC's (applicant) application for confidential designation, docketed September 11, 2025 (TN 265984). The application requests confidential designation for the following record:

- CEC PACE Form 1312 submitted by PACE Funding Group LLC, a PACE program administrator

The applicant seeks confidential designation of customer data, which includes customer address, and customer APN. The applicant seeks confidential information for the entire form and for an indefinite period of time.

Confidentiality Claims

A properly filed application for confidentiality shall be granted under California Code of Regulations, title 20, section 2505(a)(3)(A), "if the applicant makes a reasonable claim that the Public Records Act or other provision of law authorizes the Commission to keep the record confidential."

California Government Code section 7922.000 provides that an agency may withhold information from disclosure where the public interest served by nondisclosure clearly outweighs the public interest of disclosure. The applicant claims reports contain personally identifiable information and thus should be considered confidential.

Discussion

Financial Code section 22688 prohibits financial institutions and PACE program administrators from disclosing nonpublic personal information of the consumer to whom the nonpublic personal information related. The submitted data sets contain sensitive customer identification and energy consumption information. This information is protected from public disclosure under Financial Code section 22688, and the public interest served by not disclosing this information also clearly outweighs the public interest served by disclosure. (Gov. Code, § 7922.000.)

Executive Director's Determination

The applicant has made a reasonable claim that the portions of the records identified above, which contain personal information about the applicant's customers, can be maintained as confidential indefinitely.

Be advised that persons may petition to inspect or copy records that have been designated as confidential, the executive director may disclose, or release records previously designated as confidential in certain circumstances, and the CEC may hold a hearing to determine the confidentiality of its records on its own motion or on a motion by CEC staff. The procedures and criteria for disclosing or releasing, filing, reviewing, and acting upon such petitions or motions are set forth in the California Code of Regulations, title 20, sections 2506 through 2508.

If you have questions, please email confidentialityapplication@energy.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'Drew Bohan', written in a cursive style.

Drew Bohan
Executive Director