

DOCKETED

Docket Number:	22-RENEW-01
Project Title:	Reliability Reserve Incentive Programs
TN #:	271579
Document Title:	Form13 Request for Confidentiality
Description:	N/A
Filer:	Margot Moseley
Organization:	Renew Home
Submitter Role:	Applicant
Submission Date:	7/22/2026 11:31:21 AM
Docketed Date:	7/22/2026



Application for Confidential Designation:

Demand Side Grid Support Option 4 Enrolled Participation and Performance Reports

Renew Home seeks confidential treatment of information submitted to the California Energy Commission (CEC) for purposes of participating in the Demand Side Grid Support (DSGS) program, Option 4. Renew Home will provide the requested data to the CEC as required under the DSGS program. This application seeks confidential designation solely to prevent public disclosure of sensitive customer and operational data. Specifically, we seek confidential designation for all information submitted in Enrolled Participant Reports and Option 4 Performance Reports. The following letter contains responses required for confidential designation by form CEC-13.

1. Contact Information: (20 CCR 1208.1.)
 - a. Applicant Name: Renew Home, LLC
 - b. Contact Name: Christopher Mortweet, Chief Legal Officer
 - c. Phone Number: (844) 646-2664 ext. 700
 - d. E-mail: legal@renewhome.com
 - e. Proceeding Name: Reliability Reserve Incentive Programs
 - f. Docket Number: 22-RENEW-01
2. Title, date, and description (including number of pages) of the information or data for which you request confidential designation. (20 CCR 1208.1.)
 - a. Participation Report for Participation Option 4¹, to be submitted at least five business days prior to the start of each participation month
 - b. Option 4 Performance Report², to be submitted within 10 business days of a program or test event
3. Specify the part(s) of the information or data for which you request confidential designation. (If the data is in charts or spreadsheets, highlighting is sufficient.) (20 CCR 2505(a)(1)(B.))
 - a. Renew Home requests confidential treatment for all fields that contain customer-identifying information, device-level operational data, and interval performance data, including but not limited to the following:
 - i. Confidential Participation Report Fields:

¹ DSGS Guidelines, Chapter 2, Section D.1.f

² DSGS Guidelines, Chapter 2, Section D.4

1. Service_Account_Address_1³
2. Service_Account_Address_2⁴
3. City⁵
4. ZIP_Code⁶
- ii. Confidential Performance Report Fields:
 1. Heat High⁷
 2. Heat Other⁸
 3. Cool High⁹
 4. Cool Other¹⁰
 5. *Interval Values*¹¹
4. State and justify the length of time the CEC should keep the information or data confidential. The term requested must be relevant to the stated basis for confidentiality. (20 CCR 2505(a)(1)(C.))
 - a. Renew Home requests confidential treatment for an indefinite period. The sensitivity of the data does not diminish over time because it reflects persistent characteristics of customer locations, device behavior, and portfolio performance that retain competitive and privacy sensitivity.
5. State the provision(s) of the California Public Records Act or other law that allows the CEC to keep the information or data confidential and explain why the provision(s) apply to that material. (See Gov. Code, §§ 7920.000-7930.215.) (20 CCR (a)(1)(D.))
 - a. The data is exempt under Government Code § 7927.410, which explicitly prohibits the disclosure of “utility usage data” and “home addresses,” of utility customers. Public disclosure of specific service addresses would risk violating the privacy rights of Renew Home’s individual residential

³ https://dsgs.olivineinc.com/_files/dsgs/2025-DSGS-Option-4-Seasonal-Participant-Enrollment-Technical-Guide.pdf, p. 3

⁴ https://dsgs.olivineinc.com/_files/dsgs/2025-DSGS-Option-4-Seasonal-Participant-Enrollment-Technical-Guide.pdf, p. 3

⁵ https://dsgs.olivineinc.com/_files/dsgs/2025-DSGS-Option-4-Seasonal-Participant-Enrollment-Technical-Guide.pdf, p. 3

⁶ https://dsgs.olivineinc.com/_files/dsgs/2025-DSGS-Option-4-Seasonal-Participant-Enrollment-Technical-Guide.pdf, p. 3

⁷ <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 5

⁸ <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 6

⁹ <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 6

¹⁰ <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 6

¹¹ <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 8

participants. Furthermore, proprietary device-level runtime data constitutes highly sensitive operational intelligence that warrants the same stringent legal protections as utility usage data under California law.

- b. The data is exempt under Government Code § 7927.705, which protects records that are exempt or prohibited from disclosure pursuant to state law. The information (specifically granular interval device runtimes) constitutes a trade secret because it: (1) derives independent economic value from not being generally known to the public or competitors who could obtain value from its use, and (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.
 - c. The data is also exempt under Government Code § 7922.000. The program provider will have sufficient data to evaluate the measurement and verification of the resource without disclosing the workings of the technology to the public. The public interest in maintaining a competitive and secure virtual power plant market—which depends on aggregators being able to protect proprietary operational data—clearly outweighs the public interest in disclosing site-specific performance data.
6. If the applicant believes that the information or data should not be disclosed because it contains trade secrets or its disclosure would otherwise cause a loss of a competitive advantage, the application also shall state: (20 CCR (a)(1)(D.))
 - a. The specific nature of that advantage: Renew Home’s competitive advantage lies in its ability to respect household preferences and comfort with proprietary load-shaping logic and the performance characteristics of its aggregated residential fleet. The Participation and Performance Reports reveal the specific density, geographic distribution, and response reliability of Renew Home’s enrolled users.
 - b. How the advantage would be lost: If disclosed, competitors could use this data to identify high-performing geographic clusters for targeted marketing or reverse-engineer Renew Home’s dispatch algorithms to gain an unfair advantage in future capacity auctions or program bidding.
 - c. The value of the information to the applicant: This data is the result of millions of dollars of investment in software development, customer acquisition, and grid-edge optimization. Its value is tied to Renew Home’s ability to provide value to our users and a predictable and reliable resource to the California grid that is distinct.
 - d. The ease or difficulty with which the information could be legitimately acquired or duplicated by others: This information is unique to the private devices owned by Renew Home’s users and the proprietary software that Renew Home employs to provide value to both users and

the grid. It is virtually impossible for a third party to legitimately acquire or duplicate this granular performance data without access to Renew Home's internal systems or individual customer accounts.

7. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions. State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why. (20 CCR 2505(a)(1)(E.))
 - a. Confidential data may only be disclosed when deidentified and aggregated across 100 or more user sites or devices such that individual participants and associated performance characteristics cannot be inferred. We believe this is sufficient to show the performance of the resource.
8. State how the information or data is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred. (20 CCR 2505(a)(1)(F.))
 - a. Renew Home maintains strict controls over customer-identifying and device-level data through contractual, technical, and administrative safeguards. Access is restricted to authorized personnel and entities involved in program administration and evaluation, and data is protected consistent with applicable privacy laws and industry practices. Consistent with our partner obligations, Renew Home implements controls (e.g., Data Protection Agreements or confidentiality designation) to ensure that any third-party evaluators or implementers handle this information securely and appropriately. When such data is shared, it is done for purposes of participant enrollment, program participation, and measurement and verification, and is subject to appropriate confidentiality and data protection requirements.
9. At the signature line, include a certification stating: "I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge." (20 CCR 2505(a)(1)(G.))
 - a. See below.
10. State whether the applicant is a company, firm, partnership, trust, corporation, or other business entity, or an organization, or association and state that the person preparing the request is authorized to make the application and certification on behalf of the entity, organization, or association. (20 CCR 2505(a)(1)(G.))
 - a. The applicant, Renew Home, is a limited liability corporation. Christopher Mortweet, the Chief Legal Officer for Renew Home, is authorized to submit this application on behalf of the corporation.

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge.

Signed by:

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Name: Christopher Mortweet

Title: Chief Legal Officer, Renew Home, LLC

Date: 7/6/2026