

DOCKETED	
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Application for Confidential Designation:

Demand Side Grid Support Option 4 Enrolled Participation 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, which is also provided to the CEC as required under the DSGS program. This application seeks confidential designation solely to prevent public disclosure of sensitive customer data. Specifically, we seek confidential designation for all information submitted in Enrolled Participant 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. August 2026 Participation Report for Participation Option 4¹
 - i. SCE - September Report includes enrollment data for 143,772 Devices in a 10.4MB .xlsx
 - ii. SDG&E - August report includes enrollment data for 45,613 Devices in a 3.2 MB .xlsx
 - iii. Both reports were submitted for participation to Olivine on September 1, 2026.
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, including but not limited to the following:

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

- i. Service_Account_Address_1²
 - ii. Service_Account_Address_2³
 - iii. City⁴
 - iv. ZIP_Code⁵
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 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 “home addresses,” of utility customers. Public disclosure of specific service addresses would risk violating the privacy rights of Renew Home’s individual residential participants.
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 customer rosters. The Participation Report reveals the specific geographic density and distribution of Renew Home’s enrolled users.
 - b. How the advantage would be lost: If disclosed, competitors could use this data to poach customers by identifying geographic clusters for targeted marketing to gain an unfair advantage in future capacity solicitations or program participation.
 - c. The value of the information to the applicant: The customer roster is the result of millions of dollars of investment in customer acquisition and grid-edge optimization.

² https://dsgs.olivineinc.com/_files/dsgs/2025-DSGS-Option-4-Seasonal-Participant-Enrollment-Technical-Guide.pdf, p. 3

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

- d. The ease or difficulty with which the information could be legitimately acquired or duplicated by others: This information consists of non-public, proprietary customer relationships and participation data. It is virtually impossible for a competitor or third party to legitimately acquire, duplicate, or infer Renew Home's exact customer roster and geographic distribution without authorized access to Renew Home's secure internal databases or individual customer accounts. Public utility records, commercial address databases, and third-party marketing lists do not identify which specific households are enrolled in Renew Home's program, making this customer roster entirely unique to Renew Home and unattainable through independent means.
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 devices such that individual participants cannot be inferred.
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 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: 9/1/2026