

**DOCKETED**

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|-------------------------|----------------------------------------|
| <b>Docket Number:</b>   | 22-RENEW-01                            |
| <b>Project Title:</b>   | Reliability Reserve Incentive Programs |
| <b>TN #:</b>            | 272529                                 |
| <b>Document Title:</b>  | August 19 Event Data_CEC Form 13       |
| <b>Description:</b>     | N/A                                    |
| <b>Filer:</b>           | Margot Moseley                         |
| <b>Organization:</b>    | Renew Home                             |
| <b>Submitter Role:</b>  | Applicant                              |
| <b>Submission Date:</b> | 9/11/2026 8:20:33 AM                   |
| <b>Docketed Date:</b>   | 9/11/2026                              |



# Application for Confidential Designation:

## Demand Side Grid Support Option 4 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, 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-level operational data. Specifically, Renew Home seeks confidential designation for all information submitted in the Option 4 Performance Reports. The following letter contains the responses required for confidential designation by form CEC-13.

Renew Home's compressed runtime files exceed CEC's e-filing size limit of 50MB. As discussed with and agreed to by the CEC, the data files uploaded with this CEC submission will only include a subset of data from each aggregation that is representative of the full dataset. Complete data files for each aggregation were submitted to Olivine separately, in the required format, with no data omitted.

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. Two DSGS Option 4 Performance Reports uploaded with this CEC submission for the August 19, 2026 Event:<sup>1</sup>
    - i. SCE-DSGS\_OPTION\_4-RNH-RuntimeData-20260821223941-000.oir.txt
    - ii. SDGE-DSGS\_OPTION\_4-RNH-RuntimeData-20260821191109-000.oir.txt
  - b. 40 DSGS Option 4 Performance Reports submitted to Olivine on August 24, 2026 for the August 19, 2026 Event.<sup>2</sup>

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<sup>1</sup> DSGS Guidelines, Chapter 2, Section D.4

<sup>2</sup> DSGS Guidelines, Chapter 2, Section D.4

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 device-level operational and interval performance data, including but not limited to the following:
    - i. Heat High<sup>3</sup>
    - ii. Heat Other<sup>4</sup>
    - iii. Cool High<sup>5</sup>
    - iv. Cool Other<sup>6</sup>
    - v. Interval Values<sup>7</sup>
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 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.” 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

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<sup>3</sup> <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 5

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

<sup>5</sup> <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 6

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

<sup>7</sup> <https://dsgs.olivineinc.com/wp-content/uploads/sites/13/2025/06/2025-DSGS-Option-4-Interval-Data-Specification-v1.pdf>, p. 8

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 proprietary load-shaping algorithms, predictive thermal modeling, and aggregated fleet dispatch strategies. The Option 4 Performance Report contains granular, device-level interval telemetry (such as heating/cooling runtime flags and interval values) that directly reflect the operational outputs, responsiveness, and available capacity of Renew Home’s virtual power plant fleet.
  - b. How the advantage would be lost: If disclosed, competitors could analyze this sub-interval runtime data to reconstruct Renew Home’s control logic, fleet availability curves, and thermal response patterns. Access to this operational intelligence would allow competitors to replicate our dispatch strategies and underbid Renew Home in future capacity solicitations without incurring the substantial research and development costs required to design these optimization models.
  - c. The value of the information to the applicant: This telemetry represents the tangible output of millions of dollars invested in proprietary software development, machine learning algorithms, and grid-edge optimization. Its value depends on keeping our operational IP and dispatch efficiency confidential, allowing Renew Home to offer superior reliability to the California grid while maintaining a unique market position.
  - 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, as standard

utility smart meter data only tracks whole-building usage, not device-level runtimes.

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 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 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 contractual controls (e.g., Data Protection Agreements) to ensure that any third-party evaluators or implementers handle this information strictly as "data processors," preventing further disclosure and maintaining the same level of secrecy Renew Home applies internally. When such data is shared, it is done solely 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:  
  
6B94BE1B68FF4DD...

Name: Christopher Mortweet

Title: Chief Legal Officer, Renew Home, LLC

Date: 9/10/2026