

DOCKETED

Docket Number:	15-OIR-05
Project Title:	Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802
TN #:	272810
Document Title:	New confidential designation application for BRN# CA037157
Description:	***This application replaces TN271685***
Filer:	Judhajit
Organization:	Applied Materials
Submitter Role:	Applicant
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September 15, 2026

Via CEC Confidential E-Filing System
Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, California 95814

Re: Docket No. 15-OIR-05 — New Application for Confidential Designation; response to the Commission's letter of September 1, 2026, concerning TN 271685; **BRN CA037157** (3100 Bowers Avenue, Santa Clara, CA)

Dear Mr. Bohan:

Applied Materials, Inc. (Applied Materials) submits the enclosed new application for confidential designation in response to the Commission's letter dated September 1, 2026. That letter identified information missing from the application docketed July 28, 2026 (TN 271685) and directed Applied Materials to file a new application with clarifying information within fourteen days. This filing is made within that period. Consistent with the Commission's confirmation to Applied Materials, this application replaces the submittal docketed as TN 271685 in its entirety.

Change in scope: TN 271685 sought confidential designation for records associated with two properties: 974 E. Arques Avenue, Sunnyvale (BRN CA029379) and 3100 Bowers Avenue, Santa Clara (BRN CA037157). The enclosed new application seeks designation for 3100 Bowers Avenue only. 974 E. Arques Avenue is a campus property (part of the Applied Materials Arques Campus). When the floor areas of the buildings on that campus are considered together, laboratory use exceeds the threshold for coverage under the benchmarking program. That property is therefore not a disclosable building, and Applied Materials seek no confidential designation for it.

Withdrawal of the CA029379 records: Because 974 E. Arques Avenue is not a disclosable building, Applied Materials respectfully requests that the following records, submitted with TN 271685, be withdrawn from the docket together with that superseded submittal:

- CA029379_2025 California Energy Commission Benchmarking_B81.xls (calendar year 2024)
- CA029379_2026 California Energy Commission Benchmarking_B81.xls (calendar year 2025)

Applied Materials asks that these records not be treated as public by reason of the narrowed scope of the enclosed application. No confidentiality determination is sought for them; instead, we request that they be removed from the docket along with the submittal they accompanied.

The enclosed application addresses the following deficiencies identified in the Commission's letter, as to 3100 Bowers Avenue:

1: Applied Materials no longer seeks confidential designation for information the regulations identify as public. The request is limited to the potentially exempt categories in Title 20, California Code of Regulations, section 1683(c)(3)(N) through (R). The two enclosed records have been

modified accordingly: previously highlighted cells including gross floor area, primary property type, year built, occupancy, building and property identifiers, number of buildings, active energy meter counts, and published emissions factors are no longer highlighted, and Applied Materials asserts no confidentiality claim as to those fields.

2: The application provides information required under sections 1683(b)(3) and 1683(b)(4). 3100 Bowers Avenue is a disclosable building: a single building of 102,326 square feet of gross floor area, with office as the largest property use type, laboratory use below half of gross floor area, and no residential utility accounts. It was served continuously during calendar years 2024 and 2025 by one active electric account and one active gas account, within the category fewer than three under either a per-energy-type or an aggregate reading of the regulation. Both accounts are held by Applied Materials as building owner. Account-level detail appears in Appendix A of the application. Applied Materials maintains the underlying utility account records and will provide them to the Commission on request.

3: Responding directly to the Commission's instruction to identify any disclosable building in which fewer than three active utility accounts exist and one or more utility customers other than the building owner have not granted permission for public disclosure 20 CCR §1683(b)(3): Applied Materials identifies no such building. No utility customer other than the building owner held an active account serving 3100 Bowers Avenue during the reporting years, so there is no non-owner customer whose permission was sought, granted, or withheld.

Applied Materials requests that the Executive Director determine under section 1683(b)(4)(B) that disclosure of the identified owner energy-use information would release proprietary information characterizable as a trade secret, designate that information confidential for five years, and limit public disclosure of data for this building to the items authorized by §1683(c)(4).

Enclosed with this letter are:

- Application for Confidential Designation, with Appendices A and B
- CONFIDENTIAL - CA037157_2025 California Energy Commission Benchmarking_B2.xlsx
- CONFIDENTIAL - CA037157_2026 California Energy Commission Benchmarking_B2.xlsx

The two records are submitted separately through the confidential e-filing path. The information for which confidential designation is sought is identified by the cells highlighted in yellow. Please contact me at (408) 506-8902 or judhajit_chakraborty@amat.com with any questions.

Sincerely,



Judhajit Chakraborty
Energy & Sustainability Manager
Applied Materials, Inc.



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APPLICATION FOR CONFIDENTIAL DESIGNATION

New application filed pursuant to the Commission's letter of September 1, 2026
Building Energy Use Disclosure and Public Benchmarking Program (AB 802)

Field	Information
Applicant	Applied Materials, Inc.
Proceeding	Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802
Docket	15-OIR-05
Filing type	New application; replaces TN 271685 in its entirety
Prior filing	TN 271685, docketed July 28, 2026
CEC letter requiring new application	September 1, 2026
Building covered by this application	3100 Bowers Avenue, Santa Clara (B2), BRN CA037157
Application date	September 15, 2026

Via CEC confidential e-filing

Drew Bohan
California Energy Commission
715 P Street
Sacramento, California 95814

Re: New Application for Confidential Designation; Docket No. 15-OIR-05; replaces TN 271685; BRN CA037157 (3100 Bowers Avenue, Santa Clara)

Dear Mr. Bohan,

Applied Materials, Inc. (Applied Materials) submits this new application for confidential designation in response to the California Energy Commission (CEC) letter dated September 1, 2026, which directed Applied Materials to file a new application with clarifying information within fourteen days. Consistent with the Commission's confirmation to Applied Materials, this application replaces the submittal docketed as TN 271685 in its entirety.

Reduced scope of this application.

The new application seeks confidential designation for one building only: 3100 Bowers Avenue, Santa Clara (B2), BRN CA037157. The previously submitted TN 271685 also sought confidential designation for records associated with 974 E. Arques Avenue, Sunnyvale, BRN CA029379 (B81). Applied Materials has since determined that 974 E. Arques Avenue is a campus property, currently comprising two buildings (B81 and B85), whose combined laboratory use (for scientific experiments requiring a controlled environment) exceeds the 50% threshold of the gross floor area under the benchmarking program. There is also an under-construction lab building (EPIC) within the campus boundary. All three buildings are served by one utility account for electricity and gas. Hence, the property is exempt from the AB 802 benchmarking requirements. Applied Materials seeks no confidential designation for that property under this application, and requests that the records associated with BRN CA029379 submitted with TN 271685 be withdrawn from the docket. **An exemption request for BRN CA029379 (B81) has been submitted with supporting documentation (marked up map with campus boundaries).**



This application narrows the requested designation to the potentially exempt information identified in 20 CCR section 1683(c)(3)(N) -(R) for BRN CA037157 (3100 Bowers Avenue, Santa Clara, CA) and supplies the building- and account-specific facts requested under sections 1683(b)(3), 1683(b)(4), 1683(c)(4), and 2505(a)(1)(D). It responds to each item requested by form CEC-13 in the order the form specifies.

Index of responses to CEC-13

CEC-13 item	Response location
Compliances required as per September 1, 2026, letter from CEC (20 CCR 1683(b)(3), 1683(b)(4))	Executive Summary
1. Contact information (20 CCR 1208.1)	Section 1
2. Title, date, and description of the records, including number of pages (20 CCR 1208.1)	Section 2
3. Parts for which confidential designation is requested (20 CCR 2505(a)(1)(B))	Section 3; Appendix B; highlighting within each record
4. Length of time and justification (20 CCR 2505(a)(1)(C))	Section 4
5. Provisions of law permitting confidentiality (20 CCR 2505(a)(1)(D))	Section 5
6. Trade secret and competitive advantage, items (a)-(d) (20 CCR 2505(a)(1)(D))	Section 6, subsections 6(a) through 6(d)
7. Aggregation and masking (20 CCR 2505(a)(1)(E))	Section 7
8. How the records are kept confidential and prior disclosures (20 CCR 2505(a)(1)(F))	Section 8
9. Certification under penalty of perjury (20 CCR 2505(a)(1)(G))	Section 9
10. Applicant entity type and authorization (20 CCR 2505(a)(1)(G))	Section 10

Executive Summary — Compliances required as per September 1, 2026, letter from CEC

The Commission's letter states that, to use the confidentiality provisions within the benchmarking program, the building must be a disclosable building with fewer than three active utility accounts of any energy type serving the building, one of which belongs to the building owner, where any other utility customer has consented to the provision of data to facilitate public disclosure. Applied Materials establishes each element below for BRN CA037157. The facts are drawn from Applied Materials' utility account records which reports meters rather than utility accounts or account holders.

Disclosable building status. 3100 Bowers Avenue, Santa Clara (B2), BRN CA037157, is a disclosable building. It is a single building with 102,326 square feet of gross floor area, of which office space is the largest property use type; laboratory use is less than half of gross floor area, and no residential utility accounts serve it. Applied Materials does not contend that this building is exempt from the benchmarking requirement, and gross floor area is not claimed as confidential under this application.

Account-counts and ownership. The building was served during calendar years 2024 and 2025 by one active electric account and one active gas account, being two active utility accounts in total.

Since fewer than three active utility accounts serve the building, and there is no non-owner utility customer whose permission was sought, granted, or withheld, the threshold is satisfied under sections 1683(b)(3) and 1683(b)(4). Both accounts were held by Applied Materials, Inc. as the building owner and were active continuously throughout both reporting years. Account-level detail appears at Appendix A.

Requested determination. Applied Materials requests the Executive Director determination authorized by section 1683(b)(4)(B) that disclosure of the building owner's energy-use data identified in Section 3 would release proprietary information characterizable as a trade secret, and that public disclosure for this building be limited to the items authorized by section 1683(c)(4).

1. Contact information

Responsive to CEC-13 item 1 (20 CCR 1208.1).

Item	Response
Applicant name	Applied Materials, Inc.
Authorized representative	Judhajit Chakraborty, Energy & Sustainability Manager
Address	3050 Bowers Avenue, P.O. Box 58039, Santa Clara, California 95054
Phone number	(408) 506-8902
E-mail	judhajit_chakraborty@amat.com
Proceeding name	Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802
Docket number	15-OIR-05

2. Title, date, and description of the records

Responsive to CEC-13 item 2 (20 CCR 1208.1).

Applied Materials submits the two records identified below. Each is an ENERGY STAR Portfolio Manager benchmarking report generated for 3100 Bowers Avenue, Santa Clara (B2), BRN CA037157, and exported to Microsoft Excel format.

Title of record	Date generated	Data period	Extent
CONFIDENTIAL - CA037157_2025 California Energy Commission Benchmarking_B2.xlsx	July 7, 2026	Calendar year 2024	2 worksheets; 209 data fields; 12 monthly records;
CONFIDENTIAL - CA037157_2026 California Energy Commission Benchmarking_B2.xlsx	July 22, 2026	Calendar year 2025	2 worksheets; 216 data fields; 12 monthly records;

Each record comprises two worksheets. The "Information and Metrics" worksheet contains one annual property record. The "Monthly Usage" worksheet contains twelve monthly energy records for the calendar year shown.

3. Parts of the records for which confidential designation is requested

Responsive to CEC-13 item 3 (20 CCR 2505(a)(1)(B)). Highlighting within each record identifies the requested parts.

Applied Materials requests confidential designation only for the following information and derivatives, each of which is potentially exempt information under 20 CCR section 1683(c)(3):

- ENERGY STAR Score, if any (section 1683(c)(3)(N));
- Monthly and annual site energy use by energy type, being electricity and natural gas for this building (section 1683(c)(3)(O));
- Monthly and annual weather-normalized site and source energy use intensity, and the underlying energy-use values from which those metrics can be derived (section 1683(c)(3)(P));
- Monthly or annual peak electricity demand, if present or derivable (section 1683(c)(3)(Q)); and
- Total greenhouse gas emissions and direct derivative emissions metrics (section 1683(c)(3)(R)).

No confidentiality is requested under this application for items (A) through (M) listed in section 1683(c)(3), including address, county, latitude and longitude, year built, gross floor area, property name and type, Portfolio Manager Property ID, building reference number, occupancy, and number of buildings. Other fields that do not reveal or permit calculation of the categories in (N) through (R) are outside this request.

Re-scoped Items. The supporting documentation accompanying this application has been revised so that the highlighted cells identify only the bullet points described above. Highlighting previously applied to gross floor area, primary property type, year built, occupancy, building and property identifiers, number of buildings, active energy meter counts, and published emissions factors have been removed, and Applied Materials asserts no confidentiality claim to those fields. Refer to the Confidential-record designation map in Appendix B.

4. Length of time requested and justification

Responsive to CEC-13 item 4 (20 CCR 2505(a)(1)(C)).

Applied Materials requests confidential treatment for five years from the date each record is submitted with this application. The requested period is tied to the useful commercial life of the records. Year-over-year load profiles, energy intensity, fuel mix, and emissions continue to disclose facility utilization and process changes for several planning and contracting cycles. After five years, intervening production, equipment, tariff, procurement, and efficiency changes materially reduce the usefulness of the historical data to competitors, vendors, counterparties, and site-selection analysts. The requested term is therefore no longer than the period during which the stated basis for confidentiality continues to apply.

5. Provisions of law permitting the CEC to keep the records confidential

Responsive to CEC-13 item 5 (20 CCR 2505(a)(1)(D)).

The request is made under 20 CCR section 1683(b)(4)(B), which provides a specific mechanism for the Executive Director to determine that disclosure of owner energy-use data would release proprietary information characterizable as a trade secret.

The records may also be withheld under Government Code sections 7927.705 and 7922.000 because California trade-secret law protects the requested data and the public interest favors protecting Applied Materials' facility-specific operating information. Items (A) through (M) remain public.

The information is a trade secret under Civil Code section 3426.1(d). It has independent economic value because it is not generally known, and not readily ascertainable by proper means, by others who could profit from it. Applied Materials takes reasonable steps to keep it secret, as described in Section 8.

6. Trade secret and competitive advantage

Responsive to CEC-13 item 6 (20 CCR 2505(a)(1)(D)), subsections (a) through (d).

6(a) The specific nature of the competitive advantage

Applied Materials manufactures semiconductor and display-production equipment in highly competitive global markets. Facility-specific monthly and annual electricity and gas consumption, normalized intensity, and emissions form a measurable operating signature. When paired with known building size and location, that signature can reveal utilization levels, operating schedules, relative process intensity, shutdowns or expansions, and the timing and apparent effect of capital or efficiency projects. This is particularly so for 3100 Bowers Avenue, nearly half of whose floor area is laboratory space whose energy profile reflects research and process activity rather than ordinary commercial occupancy. Applied Materials uses these nonpublic comparisons to manage capacity, sequence facility investments, procure energy, negotiate utility and supplier arrangements, and evaluate operational efficiency, without giving competitors or counterparties the same visibility.

6(b) How the advantage would be lost

A knowledgeable competitor, supplier, landlord, energy vendor, or analyst could compare the two annual datasets and monthly load patterns with public information about Applied Materials' facilities and business activity. That comparison could support inferences about laboratory utilization, process changes, equipment commissioning, energy-management measures, and future capacity needs. Energy suppliers and contractors could use disclosed volumes and load shapes to sharpen pricing and negotiation positions. Competitors could use the same information to benchmark or anticipate Applied Materials research and manufacturing activity and cost structure. Public disclosure would be irreversible and would remove Applied Materials' ability to control access to this operational information.

6(c) The value of the information to Applied Materials

The data are used for internal cross-facility benchmarking, energy procurement and budgeting, capital-project evaluation, emissions management, and operational planning. Applied Materials incurs utility costs, staff time, metering and data-management expense, consultant expense, and efficiency-project investment to create and use the datasets. The value lies not merely in individual readings but in the time series and derived metrics that permit comparison of operations across months, years, and facilities.

6(d) The ease or difficulty of legitimate acquisition or duplication

The requested information cannot be reproduced reliably from public sources. A third party, only through a signed Non-Disclosure Agreements (NDAs) would need access to utility-account records,

ENERGY STAR Portfolio Manager, internal metering and facility records, or sustained site-level monitoring. Public property records may reveal address, size, or use category, but they do not disclose verified monthly energy use by type, weather-normalized performance, or derived emissions. Estimation from building size or industry averages would not duplicate the facility-specific time series and would be especially unreliable for a building with substantial laboratory floor area, whose energy intensity departs materially from commercial-office norms.

7. Aggregation and masking

Responsive to CEC-13 item 7 (20 CCR 2505(a)(1)(E)).

Applied Materials does not object to the public release of the information identified in items (A) through (M) section 1683(c)(3). However, the energy performance and consumption data listed in items (N) through (R) should not be disclosed for individual buildings or in any form that would allow a building's data to be identified or calculated.

If information in categories (N) through (R) is published, it should only be released in a sufficiently aggregated form that protects the confidentiality of individual facilities. At a minimum:

- The dataset should combine data from at least three unrelated buildings and three different utility customers.
- No single customer should account for more than 15 percent of the aggregated total.
- All direct identifiers, including property name, street address, building reference number, and ENERGY STAR Portfolio Manager Property ID, should be removed.
- Small data groups and unusual values that could allow a building's data to be determined through comparison or subtraction should be suppressed.
- Monthly data, or combinations of monthly and annual data that could be used to reconstruct a facility's energy-use profile, should not be published.

If these safeguards cannot be applied to a particular data field, that field should remain confidential for the requested period. Applied Materials further notes that facilities with specialized operations and distinctive energy-use characteristics may still be identifiable within small or narrowly defined datasets. Accordingly, the aggregation criteria described above should be treated as the minimum level of protection necessary to preserve confidentiality.

8. How the records are kept confidential, and prior disclosures

Responsive to CEC-13 item 8 (20 CCR 2505(a)(1)(F)).

Applied Materials restricts access to employees and contractors with a business need to know; stores the data in access-controlled corporate systems and in ENERGY STAR Portfolio Manager under controlled credentials; uses role-based access and corporate information-security controls; and requires relevant consultants and service providers to protect confidential information by contract. The data have not been released to the general public by Applied Materials.

The information has been disclosed to persons other than employees of Applied Materials only in the following circumstances:

- To utilities and service providers that generate, transmit, host, or analyze the data in the ordinary course of providing utility or data services;

- To Bay Efficiency, the third-party consultant that prepared the ENERGY STAR Portfolio Manager benchmarking preview reports submitted with this application and is identified within those records as having submitted them on Applied Materials' behalf; Bay Efficiency is subject to confidentiality obligations to Applied Materials; and
- To governmental agencies, including the CEC, in regulatory submissions accompanied by requests for confidential treatment.

Each of these disclosures was made under controlled conditions to entities with an obligation or expectation of confidentiality. None constitutes a public release, and none makes the records generally known or readily ascertainable by any proper means.

This application for confidential designation was prepared by Applied Materials' internal Energy & Sustainability team and is filed by Applied Materials through the CEC e-filing docket system. Bay Efficiency's role is limited to preparation and submission of the benchmarking records themselves, and Bay Efficiency is not filing this application.

9. Certification

Responsive to CEC-13 item 9 (20 CCR 2505(a)(1)(G)).

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.

Date: 09/15/2026

Signature: Judhajit Chakraborty

Judhajit Chakraborty

Energy & Sustainability Manager

Applied Materials, Inc.

10. Applicant entity type and authorization

Responsive to CEC-13 item 10 (20 CCR 2505(a)(1)(G)).

Applied Materials, Inc. is a corporation organized under the laws of the State of Delaware. The undersigned, Judhajit Chakraborty, Energy & Sustainability Manager, is the person primarily responsible for preparing this application and is authorized to make this application and the certification in Section 9 on behalf of Applied Materials, Inc.

Requested action

Applied Materials respectfully requests that the Executive Director:

- Treat this application replacing the previous submittal docketed as TN 271685 in its entirety, consistent with the Commission's confirmation to Applied Materials.
- Withdraw from the docket the records associated with BRN CA029379 (974 E. Arques Avenue, Sunnyvale) that were submitted with TN 271685, that property not being a disclosable building and no designation being sought for it.

- Determine under 20 CCR section 1683(b)(4)(B) that disclosure of the owner energy-use information identified in Section 3 for BRN CA037157 would release proprietary information characterizable as a trade secret;
- Designate the identified portions of the two submitted records confidential for five years from the date of submission;
- Limit any public disclosure for 3100 Bowers Avenue to the items authorized by section 1683(c)(4);

Appendix A — Utility-account factual certification

Account numbers are redacted to the final digits. Applied Materials maintains the underlying utility account records supporting the facts certified below and will provide them to the Commission on request.

BRN / year	Energy type	Utility	Account holder	Acct. no. (redacted)	Active dates	Owner account?	Other-customer consent
CA037157 / 2024	Electricity	Silicon Valley Power (City of Santa Clara)	Applied Materials, Inc.	xxx290-01	Continuous 1/1/2024 – 12/31/2024	Yes — building owner	N/A — no other utility customer
CA037157 / 2024	Natural gas	Pacific Gas and Electric Company	Applied Materials, Inc.	xxxx8671-7	Continuous 1/1/2024 – 12/31/2024	Yes — building owner	N/A — no other utility customer
CA037157 / 2025	Electricity	Silicon Valley Power (City of Santa Clara)	Applied Materials, Inc.	xxx290-01	Continuous 1/1/2025 – 12/31/2025	Yes — building owner	N/A — no other utility customer
CA037157 / 2025	Natural gas	Pacific Gas and Electric Company	Applied Materials, Inc.	xxxx8671-7	Continuous 1/1/2025 – 12/31/2025	Yes — building owner	N/A — no other utility customer

Account-count statement. For BRN CA037157 (3100 Bowers Avenue, Santa Clara / B2), two active utility accounts served the building during calendar years 2024 and 2025, being one active Silicon Valley Power electric account and one active Pacific Gas and Electric Company gas account. Fewer than three active utility accounts of each energy type, and fewer than three in total, served in the building. Both accounts were held by Applied Materials, Inc. as building owner and were active throughout both reporting years. The building is separately metered and separately billed on those two accounts.

Customer-consent statement. No utility customer other than Applied Materials, Inc. held an active account serving the building during calendar years 2024 or 2025. Consent by another utility customer is therefore not applicable, and no potentially exempt information belonging to a third-party customer is implicated by this application.

Meter counts. ENERGY STAR Portfolio Manager reports two active energy meters for the building in each submitted year, one electric and one gas. Each is a utility revenue meter corresponding to one of the two utility accounts listed above. The building has no onsite generation, and Applied Materials holds no net-energy-metering agreement or generation account for it.

Appendix B — Confidential-record designation map

Worksheet	Designated confidential	Not claimed under this application
Information and Metrics	Fields containing or directly deriving: ENERGY STAR Score; electricity and natural gas use; weather-normalized site and source energy and energy use intensity; peak demand; total greenhouse gas emissions and emissions intensity.	Address, county, latitude and longitude, year built, gross floor area, property and building name, property type, property use-type breakdown, parking and building floor area, Portfolio Manager Property ID, building reference number, occupancy, number of buildings, active energy meter counts, published emissions factors, and other non-derivative items (A) through (M).
Monthly Usage	All monthly energy-use values by energy type, being electricity grid purchase and natural gas.	Month and period columns, and any direct property identifiers, which remain publicly disclosable under section 1683(c)(4). Applied Materials denies the identifier columns as confidential.