DOCKETED	
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Project Title:	Energy Efficiency Program Data Collection from Non-Utility PACE Programs - Annual Reporting
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Document Title:	California Energy Commission Response to Renew Financial Group
Description:	Response to TN273195
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November 13, 2026

Via Email

Jason Fransua
Renew Financial Group
jfransua@renewfinancial.com

Application for Confidential Designation for Renew Financial Group
Docket No. 22-DATA-01

Dear Jason Fransua:

The California Energy Commission (CEC) has received Renew Financial Group's (applicant) application for confidential designation, docketed October 22, 2026 (TN 273195). The application requests confidential designation for the following record:

- CEC PACE Form

The applicant seeks confidential designation of customer data, which includes customer addresses and APNs. The applicant seeks confidential designation 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.

In addition, the applicant claims reports contain personally identifiable information and thus should be considered confidential. Government Code section 7927.700 exempts "…disclosure of personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy."

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 Government Code section 7927.700. In addition, 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,



Drew Bohan
Executive Director