

DOCKETED

Docket Number:	22-DATA-01
Project Title:	Energy Efficiency Program Data Collection from Non-Utility PACE Programs - Annual Reporting
TN #:	248465
Document Title:	Application for Confidential Designation
Description:	Fortifi Financial's Application requesting confidential designation for submitted data report.
Filer:	Kevin Davis
Organization:	Forfifi Financial
Submitter Role:	Applicant
Submission Date:	1/20/2023 11:58:01 AM
Docketed Date:	1/20/2023



APPLICATION FOR CONFIDENTIAL DESIGNATION (Title 20 Cal. Code. Regs., § 2505 et seq.)

CEC-13 (Revised 11/2021)

CALIFORNIA ENERGY COMMISSION

All confidential filings: Individual documents may not exceed 30 MB¹ or be password protected.² The application must be a separate document from the confidential materials. The application itself is not confidential and is a public record. The application will be reviewed and acted upon by the Executive Director in consultation with the Chief Counsel of the Energy Commission. (§ 2505, subd. (a))

If you have questions, contact the Docket Unit at (916) 654-5076 or email: docket@energy.ca.gov.

Existing proceedings: Applications for confidentiality and the confidential documents must be uploaded directly to the Docket Unit through the e-filing system. Paper copies or CDs do not need to be submitted. Links to the e-filing system are provided on most proceeding webpages labeled **"Submit e-filing."** Alternatively, go to: https://efiling.energy.ca.gov/Login.aspx?perms_1&returnurl=http%3A//efiling.energy.ca.gov/EFiling/EfileSelect/Proceeding.aspx. Registration is necessary the first time documents are uploaded. Once registration is complete, to submit a confidential filing click on **Quick Actions** from the **DASHBOARD** and select **Submit Confidential e-filing** from the dropdown list. The application must be uploaded first followed by one or more confidential files.

Filings not associated with any proceeding: Applications for confidentiality and the confidential materials must be submitted directly to the **Docket Unit** in paper form or on a CD, but not by email. Two copies must be submitted, on separate media if electronic, each marked with a descriptive title and "Confidential." (§ 1208.1)

TO: Energy Commission Docket Unit

Applicant: Fortifi Financial, Inc. (Kevin Davis)

Address: 12770 High Bluff Drive, San Diego, CA. 92130

Phone and E-mail: kdavis@fortifi.com

Proceeding or Project Name: Energy Efficiency Program Data Collection

Docket Number: 22-Data-01

- 1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application.**

Energy Efficiency Program Data Collection from Non-Utility PACE Programs - Fortifi Financial, Inc. dated 1/17/22
1 page ("Data Report").

- 1(b). Specify the part(s) of the information or data for which you request confidential designation.

Fortifi Financial requests the entire Data Report be designated confidential information.

¹ Contact the Docket Unit if you cannot reduce the size of your file.

² If you wish to protect the files while in transit, you may combine them in a password-protected .zip file..

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CALIFORNIA ENERGY COMMISSION

2. State and justify the length of time the Energy Commission should keep the information or data confidential.

Fortifi Financial requests the Data Report, as provided, be kept confidential in perpetuity.
The Data Report contains property owner/consumer personal private information ("PPI")

- 3(a). State the provision(s) of the Public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the information or data confidential, and explain why the provision(s) apply to that material.

California Financial Code section 22688; California Financial Information Privacy Act

- 3(b). Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

The Data Report requests includes the PII of Fortifi's customers. We believe disclosing the information would expose our customer's private data and could be used to identify them.

4. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

We believe that Data Report data could be aggregated with other data if the PII (ID number, APN, and property address) wasn't disclosed.

5. State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

This data included in the Data Report is housed on Fortifi's server and only available to authorized users. The data set, as provided in the attached Data Report, has not been previously disclosed.

I certify under penalty of perjury under the laws of the State of California that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge and that I am authorized to make the application and certification on behalf of the applicant.

Dated: 1/11/23

Signed: [Signature]



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CEC-13 (Revised 03/17)

CALIFORNIA ENERGY COMMISSION

Name (print or type): Kevin Davis

Title: (print or type) C.O.O.

Representing: Fortis Financial, Inc.

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request.