

DOCKETED	
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Project Title:	Acceptance and Training Certification
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Document Title:	Confidentiality application
Description:	N/A
Filer:	Steven
Organization:	NEMI
Submitter Role:	Applicant
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Application for Confidential Designation

Pursuant to 20 CCR §§ 1208.1 and 2505

1. Contact Information

Applicant Name: Steven Winstead

Phone Number: 916-502-2394

Email: swinstead@nemionline.org

Proceeding Name: NEMI Annual ATTCP Report

Docket Number: 13-ATTCP-01

2. Title, Date, and Description of Submitted Information

Title: NEMI Annual ATTCP Report

Description: This submission contains internal compliance documentation, audit summaries, technician certification data, and member activity reports. Total pages: 8.

3. Specific Parts Requested for Confidentiality

All pages submitted are requested for confidential designation due to the inclusion of proprietary training content, internal compliance mechanisms, and sensitive technician-level data. The entirety of the submission contains confidential elements and is not suitable for redaction or partial release.

4. Length of Time for Confidentiality

We request a confidentiality period of 10 (10) years, as the data includes current organizational procedures, certification program details, and internal member compliance information that could change over time but remains sensitive during its operational lifespan.

5. Legal Justification Under Public Records Act

Confidentiality is requested under Government Code § 7927.705 (formerly § 6254(k)), incorporating by reference Evidence Code § 1060 (trade secrets), and Government Code § 7922.000 (formerly § 6254(c)) for personnel, medical, or similar files. The information includes internal business practices and proprietary certification mechanisms, the disclosure of which would result in a competitive disadvantage to the applicant and compromise member confidentiality.

6. Competitive Advantage & Trade Secrets Justification

(a) Nature of Advantage: The submission includes proprietary methods for technician evaluation, audit triggers, and internal oversight frameworks that are unique to our ATTCP program.

(b) Loss of Advantage: Public disclosure would enable competing organizations or entities to replicate and undermine our processes without equivalent investment or oversight

accountability.

(c) Value: The information supports our credibility as a state-recognized ATTCP and forms the core of our compliance framework with the CEC.

(d) Difficulty of Acquisition: This information is developed in-house and not publicly available. It cannot be reasonably acquired or duplicated without insider access or reverse-engineering our certification process.

7. Aggregation or Masking Potential

The data cannot be effectively disclosed through aggregation or masking. The materials are holistic and interdependent — redaction or masking would render the information meaningless or misleading, defeating the purpose of the original submission.

8. Confidentiality Practices

The data is securely stored within our organization and shared only with employees, designated compliance officers, or member representatives under NDA or confidentiality agreements. No public disclosures have occurred. Any external sharing is strictly controlled and purpose-limited (e.g., for audit or certification purposes).

9. Certification

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.

10. Applicant Entity Information

The applicant is a nonprofit certification and oversight organization authorized by the California Energy Commission as an Approved Testing Technician Certification Provider (ATTCP). I, the undersigned, am authorized to submit this request and certification on behalf of the entity and its member organizations.

Steven Winstead

Steven Winstead

Representative

NEMI

Date: 2025-04-30