

DOCKETED	
Docket Number:	18-AAER-06
Project Title:	Hearth Products
TN #:	224798
Document Title:	Innovative Hearth Products' Application for Confidential Designation
Description:	Confidential 2017 sales in California and possible sales rate change in next 5 years.
Filer:	Vickie Przybilla
Organization:	Innovative Hearth Products
Submitter Role:	Applicant
Submission Date:	9/25/2018 3:04:16 PM
Docketed Date:	9/25/2018



APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20 Cal. Code. Regs., § 2505 et seq.)

CEC-13 (Revised 03/17)

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: <http://www.energy.ca.gov/e-filing/index.html>. 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: Innovative Hearth Products

Address: 1769 E Lawrence Street, Russellville, AL 35654

Phone and E-mail: (615) 925-3453 vickie.przybilla@ihp.us.com

Proceeding or Project Name:

Docket Number: 18-AAER-06

- 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.**

Submission of Hearth Products Efficiency data as of 2018.

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

Request 2017 Sales in California (units shipped) and Possible Sales Rate Change in the next five years in California (Compare 2017 to 2022) to be confidential.

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

Indefinitely

- 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.

GOV § 6250

- 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.

Providing public access to our company's customer base would violate the company's right to privacy by disclosing key accounts.

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.

Aggregated data would disclose the volume of business to competitors giving them the ability to focus on key accounts. Therefore, IHP considers aggregated data to violate the company's right to privacy.

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.

Sales data for California is not exclusively collected therefore it is kept confidential within the company.

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: September 10th, 2018

Signed:



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CALIFORNIA ENERGY COMMISSION

Name (print or type): John Phillips

Title: (print or type) Sr. Director of Engineering

Representing: Innovative Hearth Products

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

