

**DOCKETED**

<b>Docket Number:</b>	16-ENFORCE-02
<b>Project Title:</b>	Confidential Designation Applications + Miscellaneous Documents
<b>TN #:</b>	229275
<b>Document Title:</b>	Letter to Jennifer R. Dolin re Application for Confidential Designation
<b>Description:</b>	Letter
<b>Filer:</b>	Darlene Burgess
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	8/8/2019 10:15:37 AM
<b>Docketed Date:</b>	8/8/2019



August 9, 2019

Jennifer R. Dolin  
Ledvance LLC  
200 Ballardvale Street  
Wilmington, MA 01887

**RE: Application for Confidential Designation for Proprietary Information  
Including Trade Secrets, Docket No. 16-ENFORCE-02**

Dear Ms. Dolin:

The Energy Commission is in receipt of your Application for Confidentiality submitted on June 15, 2018, on behalf of Ledvance LLC (Applicant). The application was filed pursuant to California Code of Regulations, title 20, section 2505. It seeks confidential designation of date code marking disclosure information used on its lamps, which you provided to the Energy Commission pursuant to California Code of Regulations, Title 20, section 1607(b)(3).

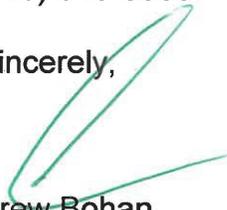
The Applicant states that the date code marking disclosure information includes proprietary trade secret information, including the vendor codes assigned for many of Ledvance's outsourced products. In addition, the Applicant states that the vendor codes are proprietary information that must remain confidential so that customers or competitors do not identify Ledvance's vendors and manufacturing locations. Finally, the Applicant states that it maintains the information confidentially, that this information should be held as confidential indefinitely, and that there is no way to aggregate the information as it "is not the type of information that can be combined with other competitors' data."

A properly filed Application for Confidentiality shall be granted under the 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 [Energy] Commission to keep the record confidential." The California Public Records Act allows for the non-disclosure of corporate proprietary information including trade secrets. (Gov. Code, §§ 6254(k), 6254.15; Evid. Code, § 1060.)

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If you have any questions concerning this matter, please contact Ralph Lee, Staff Counsel, at [ralph.lee@energy.ca.gov](mailto:ralph.lee@energy.ca.gov) or (916) 645-3953.

Sincerely,



Drew Bohan  
Executive Director

cc: Ralph Lee, Staff Counsel