

COMPLETED

Application for Designation of Confidentiality of JADE Economizer Certification Request

Attachment to Certification Request to CEC

November 2013

California Energy Commission
DOCKETED
13-BSTD-04
TN # 72372
November 20, 2013

Pursuant to Title 20, Division 2, Chapter 7, Article 2, Section 2505, Honeywell International Inc. ("Honeywell"), a corporation, hereby requests that the document entitled "Request for California Title 24 Certification JADE™ Economizer Control System," ("Certification Request") submitted to the California Energy Commission in November 2013, be deemed confidential.

Honeywell is requesting the entire Certification Request be kept confidential for a period of 3 years to protect Honeywell trade secrets and because disclosure of the information in the Certification Request would result in Honeywell losing a competitive advantage. Specifically, Honeywell requests that the entire Certification Request be kept confidential to avoid or limit "knock off" competitors from copying the system functions of Honeywell's controller. Honeywell has invested in research and development of the JADE controller to meet the specific requirements of California CEC Title 24. The testing data contained in the Certification Request provides performance and functionality data under certain conditions. This information is not publicly available and, if the Certification Request were made public and accessible to Honeywell's competitors, those competitors could use it to reverse engineer Honeywell's product or better engineer a competitive product, severely impacting Honeywell's ability to recover its research and development investment costs.

Section 6254.15 of the California Public Records Act permits confidential designation of corporate proprietary information including trade secrets.

The attachments to the Certification Request that are publicly available by Honeywell (forms 62-0331, 62-409, 63-2700 and 67-7574) may be made available on any CEC documentation or websites.

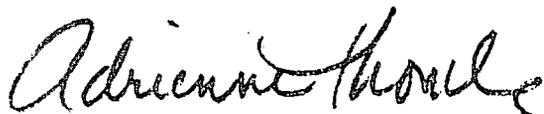
The information contained in the Certification Request is specific to Honeywell's product. It cannot be disclosed if aggregated with other information because of the same competitive concerns stated above.

The information contained in the Certification Request is not easily or otherwise accessible outside of Honeywell. Honeywell customers that purchase the JADE system have requested a copy of the Certification Request but Honeywell has not and will not share it with them until the CEC has acted on this request. Additionally, every customer that it will be shared with has a confidentiality agreement with Honeywell not to use the Certification Request or the information contained therein outside of their company. The Certification Request also has been briefly viewed by an employee of Lennox during a teleconference. The employee briefly viewed the document electronically for format purposes only, and did not review any of the substantive information. Additionally, the employee and Lennox have executed and are bound by a non-disclosure and confidentiality agreement. The Lennox employee was not given a hard or electronic copy of the document for his records.

Adrienne Thomle, Global Product Manager for Honeywell, is authorized to make this application for designation of confidential records and certification on behalf of Honeywell.

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.

Signed

A handwritten signature in black ink that reads "Adrienne Thomle". The signature is written in a cursive, flowing style.

Adrienne Thomle

Global Product Manager

Honeywell