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California Energy Commission

STAFF REPORT

Energy Code Compliance Provider Application Guide

**Staff Suggestions Regarding ECC-Provider Application
Submission, Evaluation, and Approval**

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California Energy Commission

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DISCLAIMER

This guide is to assist with regulatory compliance only, reflects the views of the staff of the California Energy Commission, and does not alter the provisions of the California Code of Regulations in any way. If there is a discrepancy between the regulations and this guide, the regulations supersede this document.

ACKNOWLEDGEMENTS

The original guidance for provider applications (publication CEC-400-2022-001) was written primarily by Efficiency Division staff Joe Loyer and Matthew Haro, P.E. Joe Loyer also led the rulemaking that was needed to relocate the Energy Code's field verification and diagnostic testing program within the California Code of Regulations from Title 20 to Title 24 and to ensure the result included needed improvements.

This revision to provider application guidance has been informed by two rulemaking proceedings, the original guidance document, and stakeholder feedback about the new Energy Code Compliance (ECC) Program, as well as many lessons learned in the implementation of the HERS Program through multiple Energy Code updates. In the time since the original staff guidance was published, staff re-approved two HERS providers. Also, mechanical engineer Archana Etikala led the review and approval of the first new HERS provider since the 2016 Energy Code was in effect.

Legal direction was provided by staff counsel Michael Murza and Isaac Serratos. Standards Compliance Branch Manager Che Geiser and supervisor Chris Olvera offered direction that extended the report's usefulness and improved its readability. Bill Pennington, advisor to Commissioner McAllister and pioneer of the Energy Code and the HERS Program, reviewed a late draft of the report and contributed helpful suggestions. Carol Robinson from Media and Public Communications provided input and editorial assistance, and Tajanee Ford-Whelan provided administrative support and editing.

ABSTRACT

This document is intended to assist entities seeking California Energy Commission (CEC) approval to administer the residential Energy Code Compliance (ECC) Program in support of the 2025 Energy Code. If approved, the entity will become an Energy Code Compliance Provider (ECC-Provider) that will provide Energy Code Compliance Rater (ECC-Rater) certification and oversight services. The ECC-Provider will also operate a CEC-approved residential data registry for the production of documents that demonstrate and certify compliance with the Energy Code.

The ECC Program is established in the 2025 Energy Code by "Administrative Procedures for the Energy Code Compliance Program" in the California Code of Regulations (CCR), title 24, part 1, chapter 10, section 10-103.3.

The report identifies and explains ECC-Provider and residential data registry application regulations, then provides guidance for the organization of the respective applications. It identifies updated regulations related to ECC-Provider responsibilities and duties. The report also offers guidance on how an applicant could demonstrate meeting applicable regulations.

This document is supplemented by a checklist for applicants to use while developing an application. For each regulatory item, the checklist summarizes evaluation criteria that CEC staff could use in reviewing the applications. The staff's review will be considered by the CEC's executive director, who will recommend to the CEC to approve, limit, or deny each application.

The guidance in this report pertains to "first-time approval of an ECC-Provider" as mentioned in the ECC-Provider Approval section of the ECC Program regulations. An entity's initial ECC-Provider approval, as well as subsequent updated approvals, will rely on submission of a Full Application as detailed in 24 CCR 10-103.3(c)3.

Keywords: Energy Code Compliance, ECC, ECC Provider, ECC Rater, registry, data registry, residential data registry, program administration, single-family, multifamily

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EXECUTIVE SUMMARY

This document offers guidance on the preparation and submission of applications regarding Energy Code Compliance (ECC) program administration, to obtain California Energy Commission approval of an ECC-Provider and its residential data registry.

This guidance is intended for applications in support of the 2025 Energy Code.

California Energy Commission (CEC) staff recommends (but does not require) that each provider application organize its information and materials into the following sections:

- An introduction and summary of the application
- A complete training program that includes training presentation materials, exams, manuals, and identification of facilities and equipment.
- Detailed explanations of quality assurance (QA) procedures, including QA staff qualifications and rater and rater company discipline protocols
- Detailed explanations of the provider's services and the functionality of its data registry
- A spreadsheet-formatted list (or template) of certified raters
- Rater-Provider certification agreement templates
- Evidence of compliance with conflict-of-interest prohibitions.
- Additional sample works such as the *Consumer Information Form*, classroom and field exams, ECC-Rater and ECC-Rater Company *Separation of Services* declarations, QA audit templates, a public complaint template, and notices of violation and decertification.

This document also describes the review process and evaluation criteria that CEC staff may use to determine if the proposed ECC services and data registry meet relevant regulatory requirements. Staff will propose this determination to the CEC's executive director, who will submit a recommendation to the Commission to approve or deny the application. The applicant may commence services immediately following an approval decision made by the Commission at a business meeting.

CHAPTER 1:

Introduction

Intended Audience

This document is intended for any organization seeking approval to offer services listed in the California Code of Regulations (CCR; unless otherwise noted, all references are to the California Code of Regulations), Title 24, Part 1, Section 10-103.3, *Administrative Procedures for the Energy Code Compliance Program*, as an Energy Code Compliance (ECC) Provider and seeking approval of a residential data registry. The Energy Code and other pertinent publications are listed and linked in APPENDIX D: Documents Referenced.

This document does not provide comprehensive guidance for waived recertification, changes to prior approvals, or remediation to decertification. This document expects that the applicant will follow the entire application submission, review, and approval process.

The newly defined and regulated *ECC-Rater Company* is also discussed in this report to guide how an ECC-Rater employer would comply with the relevant regulations, both for the benefit of the ECC-Provider applicant and the ECC-Rater Company.

ECC Program Entities

What Is an ECC-Provider?

The 2025 Energy Code defines an ECC-Provider as "an organization approved by the Commission to administer the ECC program pursuant to the requirements of Section 10-103.3." These requirements include certification and oversight of ECC-Raters and ECC-Rater Companies, as well as the operation of a CEC-approved residential data registry.

What Is a Residential Data Registry?

A residential data registry is a web-based service with a user interface and database maintained by an ECC-Provider and complies with the applicable requirements in Title 24, Part 1, and Reference Joint Appendix JA7. A residential data registry is used to register numerous residential and some nonresidential compliance documents, which are used to demonstrate compliance with the Energy Code.

What Is an ECC-Rater?

ECC-Raters are persons who are trained, tested, and certified by an ECC-Provider to conduct field verification and diagnostic testing (FV&DT) services to demonstrate compliance with the Energy Code. ECC-Raters must use a CEC-approved residential data registry for FV&DT

compliance document validation, authentication, and verification. Note that ECC-Raters are not special inspectors in the context of the California Building Code ([Title 24, Part 2](#)).¹

What Is an ECC-Rater Company?

An ECC-Rater Company is an organization certified by an ECC-Provider to offer field verification and diagnostic testing services by the ECC-Rater Company's employed ECC-Raters for the ECC Program, following the requirements of Section 10-103.3.

Program History and Recent Changes

The California Energy Commission (CEC) adopted a statewide California Home Energy Rating System (HERS) program for homes in 1999. The CEC certified HERS providers to train, test, certify, and oversee HERS raters in administering the HERS program. Title 20 of the California Code of Regulations, Sections 1670 through 1675 (HERS Program) were revised in 2009 to incorporate whole house energy ratings.

In a 2023 rulemaking, the CEC amended HERS Program regulations so that all FV&DT rating systems, procedures, and rater certification provisions could be relocated from Title 20 to the Energy Code in Title 24. The regulations that will remain in Title 20 will provide for whole-house ratings and home energy audits. The repeal of the FV&DT regulations from the HERS Program and relocation are thoroughly explained in these reports:

- [2022 Update of the Home Energy Rating System Requirements](#) (Publication Number CEC-400-2022-017-F)
- [2025 Update of the Field Verification and Diagnostic Testing Requirements](#) (Publication Number CEC-400-2023-11)

The California Building Standards Commission approved the 2025 Energy Code in December 2024 with the effective date of January 1, 2026. This guidance document is consistent with and supports the relocated FV&DT regulations.

The first of two sets of Title 20 amendments became effective on January 1, 2024. These amendments will be enforced until the 2025 Energy Code becomes effective.² This means the application process requirements for a HERS provider in the HERS Regulations of Title 20, Section 1674(c), are in effect and must be followed by CEC staff.

Until the end of calendar year 2025, the applicant may follow the effective provider application requirements of Title 20, Section 1674(a). The applicant may alternatively follow the application requirements of Title 24, Section 10-103.3(c). Regardless of this selection, the application as a whole must address all ECC-Provider responsibilities. This guidance aligns with application requirements of Title 24, Section 10-103.3(c) to address requirements that are not

¹ Title 24, Part 6, Residential Reference Appendix RA2.1.

² Title 20, Sections 1670 *et seq.*

expressed in Title 20. It should be noted that many Title 20 requirements are not applicable to an ECC-Provider.

Starting January 1, 2026, the application process will follow Title 24, Section 10-110. See Table 1: Applicable Regulations.

Pertinent Regulations

To become an ECC-Provider ahead of the [2025 Energy Code](#) effective date, two applications must be submitted: application for approval as an ECC-Provider and an application for approval of a 2025 Energy Code-compliant residential data registry.

When the second set of HERS Program amendments take effect, certified HERS providers will be tentatively recognized as ECC-Providers. ECC-Providers recognized under these conditions are not compliant with 2025 Energy Code regulations until approved by the CEC.

Likewise, HERS Raters will be tentatively recognized as ECC-Raters to avoid disruption of compliance and enforcement activities. ECC-Raters may continue to perform HERS rater responsibilities within the rater's scope of certification (e.g., new construction, alterations-only, 2022 Energy Code, and so forth). ECC-Raters recognized under these conditions are not compliant with 2025 Energy Code regulations until recertified by an approved ECC-Provider.

ECC-Provider responsibilities include implementation of a quality assurance program, and collection and maintenance of data associated with the ECC Program.³ ECC-Providers are also residential data registration providers. The data registry may be used to generate compliance documents when required by the Energy Code.⁴ To provide a residential data registry, an entity must also be an ECC-Provider.

Table 1 identifies regulations showing specific scopes and effective dates. The regulations for applications for which this guidance is provided are shaded in the Table. Note: "Section" is denoted using the § symbol.

Table 1: Applicable Regulations and Effective Dates

Scope	Until December 31, 2025	On January 1, 2026
FV&DT Provider Application Process	Title 20, §1674(c)	Title 24, §10-110
FV&DT Provider Application Parts	Title 20, §1674(a)	2025 Title 24, §10-103.3(c)
FV&DT Provider Responsibilities	Title 20, §1673	2025 Title 24, §10-103.3(d)
FV&DT Protocols	2022 Title 24 (RA3, NA2)	2025 Title 24 (RA3, NA2)
Document Registration	2022 Title 24 (JA7)	2025 Title 24 (JA7)
Registry Application Process	2022 Title 24, §10-110	2025 Title 24, §10-110
Registry Application Parts	2022 Title 24, §10-109	2025 Title 24, §10-109

Source: CEC staff

³ Title 24, Part 1, Section 10-103.3(d)

⁴ Title 24, Part 1, Section 10-109, and Reference Joint Appendix JA7.

High-Level Application Requirements and Timelines

An entity seeking certification as an ECC-Provider and approval of a residential data registry must submit two applications to the CEC:

1. An ECC-Provider application that addresses application and provider requirements of Title 24, Chapter 10, Article 1, Section 10-103.3, and other related requirements in the 2025 Energy Code. This process is defined by Title 20, Section 1674(c) until January 1, 2026, when the Title 24, Section 10-110 process takes effect.
2. A residential data registry application that satisfies application requirements of Title 24, Chapter 10, Article 1, Section 10-109, as well as Reference Joint Appendix JA7. The review process for this application is specified by Title 24, Section 10-110.

CEC staff is tasked with reviewing both applications in parallel and confirming they meet all applicable regulatory requirements for compliance with the 2025 Energy Code.

The CEC's evaluation of provider and registry applications includes the following sequential milestones with time limits for staff to review and respond to an application. CHAPTER 4: Review and Approval Process expands on the process. The milestones include:

- I. **Completeness:** The executive director's finding that the application is complete.
- II. **Public Review:** This review includes the public portions of the application and the completeness determination. A public workshop is optional.
- III. **Request for Additional Information:** The executive director may request further information and clarification needed to satisfy staff's evaluation of compliance with applicable requirements.
- IV. **Recommendation to the Commission:** The executive director must recommend approval, limitation, or denial of the application.
- V. **Applicant and Commission Review:** The applicant will receive a copy of the recommendation. Staff will also docket the recommendation for public review and reference in the CEC's business meeting agenda notice.
- VI. **Consideration by the CEC at a regularly scheduled business meeting.**

Figure 1: CNRA Building and Sacramento Light Rail Train at Station



Source: California Energy Commission

CHAPTER 2:

Constructing and Submitting the Application

This chapter describes:

- Regulations and recommendations regarding:
 - Application process requirements.
 - Provider responsibilities.
- Staff recommendations on application parts and satisfactory evidence.
- Staff recommendations regarding application preparation and submission.

References That Contain Application Requirements

The following publications describe the minimum content required for the ECC-Provider and residential data registry applications:

- [*HERS Program regulations*](#) (until December 31, 2025)
 - Title 20, Section 1674(a), HERS provider application components
 - Title 20, Section 1674(c), HERS provider application process
- [*2022 Building Energy Efficiency Standards*](#) (until December 31, 2025)
 - Title 24, Part 1, Section 10-109 and JA7.8, data registry application components
 - Title 24, Part 1, Section 10-110, registry application process only
- [*2025 Building Energy Efficiency Standards*](#) (effective January 1, 2026)
 - Title 24, Part 1, Section 10-103.3(c), ECC-Provider application requirements
 - Title 24, Part 1, Section 10-109 and JA7.8, data registry application components
 - Title 24, Part 1, Section 10-110, all application processes

The applicant should completely address Section 10-103.3(c)3 and may follow the outline of application requirements given below under Provider Application Components to ensure that all 2025-based requirements are addressed.

Triennial Reapproval, Remediation, and Updated Application options are not available until January 1, 2026, and only to entities that have received full approval as an ECC-Provider.

References That Contain Provider Responsibilities

The following publications describe the topics to be addressed by the ECC-Provider and residential data registry applications:

- [*2025 Building Energy Efficiency Standards*](#), Provider responsibilities are found primarily in Section 10-103.3 as well as the Reference Appendices:
 - Reference Residential Appendix RA2 (Residential Verification, Testing, and Documentation Procedures)
 - Reference Residential Appendix RA3 (Residential Field Verification and Diagnostic Test Protocols)
 - Reference Nonresidential Appendix NA1 (Nonresidential Verification, Testing, and Documentation Procedures)
 - Reference Nonresidential Appendix NA2 (Nonresidential Field Verification and Diagnostic Test Procedures)⁵
 - Reference Joint Appendix JA7 (Data Registry Requirements)
- [*HERS Technical Manual*](#) (in part, for procedures to verify existing conditions)
- [*Data Registry Requirements Manual*](#) is another guidance document that aids in the development and functionality of the provider's residential data registry. Significant changes include guidance regarding digital signatures (Section 5), document configuration rules (Section 6), and sampling rules (Section 7).

Two Applications for Paired Approval

Because the regulations describe separate processes, staff recommends that the applicant prepare and submit two applications as one joint application. To offer services as an ECC-Provider and maintain a residential data registry, entities will submit two applications simultaneously to the CEC for consideration. The provider application must contain all the required information as specified in Title 24, Section 10-103.3, and as applicable to the scope of the application. The provider application should identify if any requirements are not applicable to the scope of the application (for example, excluding the “challenge test” from the training curriculum). The residential data registry application must contain all the information specified in Title 24, Part 1, Section 10-109, and the Reference Appendices adopted as a part of the Energy Code.

Provider-Registry Joint Application Submission Method

The entire process that includes submission, evaluation, iteration, and public notices up to and beyond approval is detailed in CHAPTER 4: Review and Approval Process.

Materials, including revisions to previously submitted materials, should be submitted to the CEC using the [eFiling system](#). (Emails and cloud sharing sites do not facilitate a secure public record, which is necessary for the evaluation and commission approval process.) Staff will use

⁵ JA7, RA2, RA3, NA1, and NA2 are sections within the References Appendices.

the "2025 ECC Provider Application" docket log [25-BSTD-01](#) to facilitate application submissions, evaluations, recommendations, and approvals.⁶

If the applicant would like the CEC to protect content the applicant considers confidential, then the applicant must submit an [Application for Confidential Designation \(CEC-13\)](#) specific to that content.

Specifications for each application are described in the following two sections below:

- Provider Application Components
- Residential Data Registry Application Components

Provider Application Components

Staff recommends that the ECC-Provider application address mandatory requirements using the following structure, which is also presented in APPENDIX A: Checklist for Applicants:

1. Application Introductions

- **Scope, publicly submitted.** Include a statement that describes the comprehensive scope of the full ECC-Provider application. Section 10-103.3(c)1 states, "All applications must include a statement of scope that indicates what services the applicant intends to provide to the marketplace." The applicant should define its rater certifications specific to building types and measures to be verified. Default coverage includes full provisions under Title 24, Part 6, Section 110.0, and wherever FV&DT is required for compliance. The introduction may specify the triennial code cycle and type of application (for example, full, amended, or updated) within the introduction.
- **Applicant identification, publicly submitted, see note.** Include information required by items B through F, specified by Section 10-103.3(c)3, quoted below:
 - B. The full legal name of the applicant [as] registered with the California Secretary of State.
 - C. The full legal name, date of birth, current residential address, and social security number of every individual with an ownership interest in and principal of the ECC-Provider applicant.
 - D. A complete list of any entities that have business relationships with the applicant such as parent companies, subsidiaries, affiliates, and/or any past names under which the entity has conducted business as an ECC-Provider, if applicable.
 - E. The Triennial Code Cycle for which the applicant intends to operate as an ECC-Provider.
 - F. The contact information for one or more Designated Contacts who the Commission can contact as needed.

⁶ CEC announcements are made using the govDelivery service. To subscribe, first [visit this page to see a listing of general topics](#). Notices will be sent to relevant [Efficiency Topics](#).

Note: information required by Section 10-103.3(c)3C includes naturally confidential information (that is, personally identifiable information, or PII). Such information should be submitted separately and with a request for confidential designation, consistent with 20 CCR 2505. Staff intends for publicly filed business information to be submitted to the CEC publicly for transparency.

- 2. Detailed explanations** to demonstrate “Evidence of Ability to Satisfy ECC-Provider Requirements” and ways that the applicant's services will meet applicable 2025 Energy Code requirements, per Section 10-103.3(c)3A. Table 2 offers a non-exhaustive list of responsibilities that could require detailed explanations within the application.

Table 2: Detailed Explanations

Provider Responsibility	Reference
Conflict of Interest prohibitions and safeguards	10-103.3(b)1A
Use of Registered Certificates	10-103.3(b)1Aix
Rater of Record Protocol	10-103.3(b)1Aviii
Conflicted Data Monitoring	10-103.3(b)1Bii
Prohibition on False, Inaccurate, or Incomplete Information	10-103.3(b)2
Training Procedures for ECC-Raters	10-103.3(d)1
Facilities, equipment, and practical exercises	10-103.3(d)1Av
Proctoring Software Description	10-103.3(d)1Aviii
Certification Procedures for ECC-Raters	10-103.3(d)2
Training Procedures for ECC-Rater Companies	10-103.3(d)3
Certification Procedures for ECC-Rater Companies	10-103.3(d)4
Quality Assurance Program Overview	10-103.3(d)5
Exemplary Rater Qualification	10-103.3(d)5B
Onsite, Shadow, and Desk Audits	10-103.3(d)5C
Quality Assurance Fees	10-103.3(d)5E
Complaints handling	10-103.3(d)6
ECC-Rater Discipline	10-103.3(d)7
ECC-Rater Company Discipline	10-103.3(d)8
Data collection FV&DT	10-103.3(d)9A
Data collection, QA	10-103.3(d)9B
Data Retention	10-103.3(d)10
Data Reporting	10-103.3(d)11

Provider Responsibility	Reference
Data Registry Requirements	10-103.3(d)13
ECC-Provider Discipline	10-103.3(d)15

Source: CEC staff

3. Additional exhibits as “Evidence of Ability to Satisfy ECC-Provider Requirements,” including materials required by Section 10-103.3(c)3A, summarized as follows:

Table 3: Evidentiary Exhibits

Subject	References	Description
FV&DT Service Site Report	10-103.3(b)1Avi	A template report to be adapted then issued by the rater or rater company.
Consumer Information Form	10-103.3(b)1Avii	A template report to be issued by the provider. Contains information available in the data registry.
Declaration of ECC-Rater Company Separation of Services	10-103.3(f)2Diii	The applicant may submit a form letter, agreement, or standard language to be used by its certified ECC-Rater Companies.
Laboratory training facilities and practical exercises	10-103.3(d)1Av	This exhibit identifies locations by address and describes equipment, systems, and exercises available.
Written test	10-103.3(d)1Avi	This exhibit may represent an actual rater test, but the application should present the full set of written questions, with solutions.
Practical exam	10-103.3(d)1Avii	Include a walkthrough or outline
Proctoring software	10-103.3(d)1Aviii	If utilized, must be submitted.
Challenge Test	10-103.3(d)1B	If utilized, a description of the challenge process and student prerequisites, plus example questions with solutions.
Update Training	10-103.3(d)1C	Applicable to “previously certified ECC-Raters” and includes changes made during a code cycle update. An outline, including significant details, of the rater recertification "update training" course and activities.

Subject	References	Description
Certification Agreements	10-103.3(d)2B (Rater) 10-103.3(d)4B (Rater Company)	Agreement boilerplate or template documents should be submitted.
List of ECC-Raters	10-103.3(d)2D	A directory or mockup of rater listings that includes each rater's identification, contact information, and status.
List of ECC-Rater Companies	10-103.3(d)4C	This list will be public on the provider's web site. A template may be submitted for evaluation.
Quality Assurance Staff Qualification	10-103.3(d)5A	This may include a list of personnel but should detail qualifications that the staff would meet to maintain its QA program.
Notice of Violation	10-103.3(d)7A (rater) 10-103.3(d)8A (rater company)	Notice boilerplate or template documents should be submitted
Notice of Probation	10-103.3(d)7B (rater) 10-103.3(d)8B (rater company)	Notice boilerplate or template documents should be submitted
Notice of Suspension	10-103.3(d)7C (rater) 10-103.3(d)8C (rater company)	Notice boilerplate or template documents should be submitted
Notice of Decertification	10-103.3(d)7D (rater) 10-103.3(d)8D (rater company)	Notice boilerplate or template documents should be submitted
QA Reports	10-103.3(d)5F (Quarterly) 10-103.3(d)5G (Annual)	These may be template reports that include data headers and an explanation for each reporting element.
FV&DT procedures	103.3(d)1Ai 103.3(d)1Aii See also 10-103.3(d)1Aiv	This is not a submission of RA3 and NA2. Instead, the application may address this item within the training materials. These include graphical or physical demonstrations of instruments and how they would be configured in a field setting, or walkthrough exercises in

Subject	References	Description
		<p>navigating product rating databases.</p> <p>Whole-house rating procedures for verification of “existing conditions when specified in the compliance model” as a measure per Section 150.2 (procedures are found in the HERS Technical Manual).</p>
Data Registry User Manual	10-103.3(d)13	The data registry application requires this exhibit or an alternative. See JA7.8.5 for full requirements.

Source: CEC Staff

The applicant also needs to address requirements specified in Reference Appendices RA2 and JA7. Additional guidance follows.

Staff Commentary for Items in Table 2 and Table 3

The guidance below expands on some requirements.

Training and Certification of ECC-Raters and ECC-Rater Companies

This section provides a description of the provider's training program. The program will describe how a rater or rater company applicant may approach the provider, meet the certification qualifications, and complete the certification. The program may also offer an "update" pathway for certified raters that are seeking to update any certifications to a new Energy Code cycle. A challenge test should be declared in this section.

Update Training

Given recent major program changes, the update training is expected to thoroughly explain the new and updated procedures and certification requirements (specified in Section 10-103.3) to the same degree or detail as for a new ECC-rater. Typically, update training specifies changes to the Energy Code that would affect triggering of tested measures and changes to FV&DT protocols.

Training and Testing Curriculum

This section includes training materials and an overview for each type of certification (whether ECC-Rater or ECC-Rater Company).

This part of the application identifies training courses, platforms, and facilities. CEC staff would like to know what types of features and systems are on site for demonstration and practical testing but realizes that these details could change over time. If information is not required by Section 10-103.3, then modifications will not affect approval until the next application event (for example, triennial update, amended application, and so forth).

Because of the time needed for production of on-demand training courses, the applicant will submit the base materials to be used on any online platform. The application should describe how the materials will be used and how the content will be delivered if converted to other formats.

A list of training subject areas is given in Section 10-103.3(d)1A, items i and ii. The training courses may present the subjects in a different order, but staff intends to cross-check the materials with the regulations. The applicant may use the Regulatory Checklist to indicate where the requirements have been addressed in the application materials.

Certification Agreements With ECC-Raters and Rater Companies

At a minimum, a copy of these agreements should be included in the application so that CEC staff can evaluate the content to observe that the requirements are met. The applicant should also explain how and when the agreements will be executed and upheld.

Lists of Raters and Rater Companies (Formerly Referred to as a Rater Registry)

The application must include a rater and rater company directory with headings that indicate:

- Rater and Rater Company names (with an identifier number or code).
- Status (for example, active, exemplary, probationary, suspended, decertified, or inactive).
- Business contact information.

Each entry may indicate specific certifications (by code cycle and project scope), if applicable.

A previously approved provider is expected to report this directory and specify when the information was current. For new providers, an example of a populated directory will be acceptable.

Rater Company lists will be made public by the ECC-Provider.

Data Collection, Retention, Access, and Reporting — Conflicted Data

The provider is expected to collect data as the records are produced. Data sources include compliance documents generated on the data registry and quality assurance actions.

Data reporting for 500 buildings

The code text in Section 10-103.3(d)9A describes which metrics to compile throughout the year.

Quality Assurance

Quality assurance includes the progression of disciplinary actions through remedial steps. It also specifies qualifications of QA staff, who may not be active ECC-Raters. The program must include procedures for conducting onsite audits, shadow audits, and desk audits. Procedures will describe how the provider will determine flawed results and how to pursue remedies.

Queries and Complaints (Public and CEC-Initiated)

The application will describe a complaint reporting system, which include intake channels and methods of tracking each investigation as it moves to a resolution. This information will be reported to the CEC annually.

Rater and Rater Company Discipline

Rater and Rater Company discipline may be discussed separately or included with the QA Program details as a step in the QA process when required.

Conflicts of Interest

The ECC-Provider should outline its safeguards against potential conflicts. Prohibitions are listed in Section 10-103.3(b)A and resemble the “independent” entity requirements from the HERS Program regulations. The new regulations redefine financial interest and add more prohibitions, as quoted:

- iii. For the purposes of this subdivision, a “financial interest” includes:
 - a. A business entity in which the entity or individual has a direct or indirect investment worth \$2,000 or more, or in which the entity or individual is a director, officer, partner, trustee, or employee. However, this prohibition on investments does not include ownership of less than five percent of a publicly traded company.
 - b. An ownership interest, debt agreement, or employer/employee relationship.
- iv. ECC-Providers, ECC-Raters, and ECC-Rater Companies, or principals of an ECC-Provider or ECC-Rater Company shall not perform field verification or diagnostic tests services for builders, designers, or subcontractors owned or operated by close familial relatives. For purposes of this subdivision, “close familial relative” means a spouse, domestic partner, or cohabitation partner or a parent, grandparent (including greats), sibling, child, grandchild (including greats) of the individual or spouse, domestic partner, or cohabitation partner, and any person living in the same household.
- v. ECC-Raters and ECC-Rater Companies shall not perform any construction activity on a project site for which a construction permit is issued and for which they will or are reasonably expected to perform field verification or diagnostic testing services.

Data Recording, Retention, and Reporting

This topic applies to processes for both FV&DT-based compliance and quality assurance. Responsibilities include impromptu, quarterly, and annual reporting to CEC and ongoing access.

ECC-Rater and Rater Company Certification and Responsibilities

These are written with the ECC-Rater and Company as the audiences but reflect ECC-Provider responsibilities. The application descriptions of the associated program and services should address these sections as well. See 10-103.3, items (e) and (f).

This concludes guidance for the provider application package components.

Residential Data Registry Application Package Components

This section assumes that a data registry has been developed to an extent that can be described in an application for approval.

For more information about developing a registry, consult the *2025 Data Registry Requirements Manual*,⁷ then [contact staff](#) for access to resources. A prospective data registry will likely require document schema definitions, data element mapping between compliance software and registered forms, and example software files, as well as access to the CEC's Compliance Report Generator (RG) service. The applicant is responsible for arranging third-party digital signature certification.

To assist in the applicant's preparation and the CEC's review, staff recommends that the residential data registry application package contain the following parts:

1. **An introduction, publicly submitted**, that includes a certification statement that the residential data registry conforms to application requirements specified by Title 24 Section 10-109(i)1.
2. **Evidence** that the registry and registration provider will comply with requirements in Reference Joint Appendix JA7.8, including the following (summarized from JA7.8.3.1):
 - a. Capability to produce and manage registered documents.
 - b. Electronic signature capability and management of authorized users.
 - c. A user manual or other aides that address the requirements of JA7.8.5.
 - d. Data validation.
 - e. Signer's review and electronic signature operations.
 - f. Digital signature and digital certificate compliance.
 - g. Capability to securely transmit documents and data to the CEC Compliance Document Repository (CCDR), contingent on CEC approval of the CCDR.
 - h. Document retention and submission capabilities.
 - i. Capability to receive and process electronic data using standard practices for secure data exchange, using data sources and procedures approved by the CEC for registering compliance documents.

⁷ The 2025 DRRM will be approved by the CEC in mid-2025. The [pre-approval version](#) may be relied on for most requirements until then.

- j. Capability for data exchange with the Compliance Report Generator service made available by the CEC to generate formatted electronic documents.
3. **A description of the functional or analytical capabilities** of the data registry.⁸
4. **External digital data sources (EDDS)** to be concurrently approved with the proposed residential data registry.
5. **A list of document types** that will be produced by the residential data registry. If applicable, a subset list of document types that will be available through each EDDS.
6. **Exhibits** that demonstrate evidence of development and self-testing and an outline of a real-time data registry demonstration to show that the criteria in Section 10-109 and JA7 were met.⁹

This concludes guidance for the data registry application package components.

Additional Considerations

Consumer Data. Entities that collect personal data could be subject to the California Consumer Privacy Act (CCPA). Visit the [Office of the Attorney General website](#) for details. Staff will verify the registry presents a privacy policy that notifies potential users how data might be used or shared.

The CEC logo may only be used with permission. Displays of the logo must abide by the CEC's [Conditions of Use](#). Contact the Media and Public Communications Office at 916-654-4989 or mediaoffice@energy.ca.gov for more information and to request permission. A [request form](#) is available as well.

Figure 2: CEC Logo



Source: California Energy Commission, Media and Public Communications Office

⁸ Title 24, Section 10-109(b)2A.

⁹ JA7.8.2.2.

CHAPTER 3:

CEC Evaluation

Commission Evaluation

On behalf of the CEC's executive director, CEC staff will evaluate applications submitted using the suggested criteria included in the ECC-Provider and Residential Data Registry Checklist for Applicants (see APPENDIX A: Checklist for Applicants), which provides a comprehensive list of requirements specified in Title 20 and Title 24. Staff's evaluation criteria are guided by Title 20, Section 1674(a), the 2025 Energy Code, and the 2025 Reference Appendices. Staff will assess the application parts for sufficient detail and evidence that demonstrate compliance with all code requirements.

To assist applicants, this checklist includes optional recommendations, where appropriate, on how to best comply with regulatory requirements. While applicants are not required to follow these recommendations, staff hopes that they will help to improve and expedite application preparation and evaluation. The checklist may be submitted with an application for confidential designation. If the checklist is submitted in a format other than a spreadsheet, the text of the file should be searchable per docketing requirements.

Provider Application Evaluation

The provider applicant is expected to address mandatory requirements, define a scope of approval, and present evidence that, when approved, the provider will be capable of administering the ECC Program consistent with program regulations. Table 4, found in Chapter 4 of this report, lists significant evaluation milestones and limits to how long each step may take.

Submission

The sequence of an evaluation begins with the applicant's submission. The submission may include multiple documents. Whether submitted publicly or with a request for confidentiality, staff will begin assessing the materials to understand what was submitted and whether the application is complete as defined in Title 20, Section 1674(c)(3).

Complete Application Determination

Staff recognizes that the HERS regulations do not address FV&DT program changes, so some care will be taken to align Title 20 requirements to equivalent Title 24 requirements, or vice versa. For example, the Title 20 and Title 24 application processes identify an application status of "complete application."¹⁰ The CEC and its executive director are given the duty of determining that an application is complete, but the regulations do describe or define criteria

¹⁰ 20 CCR 1674(c)2, 24 CCR 10-110(a), and 24 CCR 10-110(b)

for what staff will refer to as "completeness." A period after this milestone gives the CEC time to ask for additional information of the applicant. In this context, completeness means that the applicant has addressed all relevant regulations or else indicated those that are not applicable. A complete application is not necessarily sufficient for the executive director to make a recommendation to approve or reject it.

For transparency, staff prefers to give the public notice when both applications meet completeness. If necessary, separate notices of complete application can be published for provider and registry applications.

Completeness varies with the scope of the application, so a clear statement of intention will guide this determination. If the scope of the provider application or the data registry application limits provisions to certain building types or compliance methods, for example, then some requirements could be considered not applicable to the scope of the application. If so, the applicant should mark those items as non-applicable (N/A) in the "Submission Title" columns or else explain these in the application. Some requirements are conditional, so that if optioned, its mandatory requirements will apply. Ultimately, staff will verify that applicable requirements have been minimally addressed in the application. Any apparent absences or omissions will be requested of the applicant to aid in this assessment.

Staff can evaluate that each regulated requirement is present in the application, is adequately described, and that the description agrees with the regulations. Citing regulation is not adequate as it does not meet the application requirements to "explain" or "produce," but acknowledging and responding to the requirement is. Doing so should make this element contribute to the overall complete status.

Staff will docket a notice of complete application and will send a copy to the applicant. This submission begins a countdown of 90 business days to when the executive director shall send a recommendation to approve or deny the provider application.¹¹

Complete applications that require revision or further detail might contain "deficiencies." Staff will summarize deficiencies to the applicant in a request for information, as allowed by the application processes.¹²

Evidentiary Evaluation

Staff will compare the complete application to applicable regulations. Staff will test the materials for accuracy, comprehensibility, and practicality. For some parts, the passing criteria will be evident in the regulations. Staff has encountered difficulty in reviewing training materials, in particular, when the materials were difficult to interpret and consequently difficult

11 Title 20, Section 1674(c)(3).

12 20 CCR 1674(c)(1) and 24 CCR 10-110(c).

to evaluate. For these reasons, Section 10-103.3(d)1Aiv requires legibility, narratives, and explanations of presentation slides.

Expectations of Training Materials

- The content is consistent with the protocols referenced by 10-103.3(d)1Ai and responsibilities listed under 10-103.3(d)1Aia.
- The title of the module clearly describes the topic and training objectives so that staff can confirm the 10-103.3(d) requirements and the presentation or supplementary materials.
- Each module should not merely repeat the regulations verbatim. Do the visuals and handbooks introduce, explain, and illustrate the concepts?
- For RA3 and NA2 protocols, the slides cover the correct and complete steps necessary to perform the field verification and diagnostic testing.
- Explain how to record test results and transfer them to the compliance forms. See 10-103.3(d)1Aiig.
- Do the materials visually illustrate tools, instruments, and configurations?
- Graphics are clearly explained through a narrative, script, or captions.
- Legibility could be affected by text or image size, resolution, or color contrast.

Residential Data Registry Evaluation

The data registration provider applicant is expected to address applicable mandatory requirements, define a scope of approval, and present evidence that, when approved, the registry will be capable of supporting the Energy Code, compliant with ECC Program regulations. Table 5 in Chapter 4 of this report lists significant evaluation milestones and limits to how long each step may take.

Applicants must demonstrate compliance with the residential data registry requirements specified in Reference Joint Appendix JA7.¹³ Additional guidance is detailed in the Data Registry Requirements Manual (DRRM). See APPENDIX D: Documents Referenced.

In addition to Sections 10-109 and 10-110, registry application approval requirements are expanded in the 2025 Reference Joint Appendices, Section JA7.8.

Generally, the applicant's registry must:

- Be owned and operated by an ECC-Provider. The provider must specify means (including the registry) of document authenticity verification.
- Give sufficient instructions within the registry interface, in a user manual, or through a series of tutorials, compliant with JA7.8.5.
- Allow secure user account enrollment with a designated authorized user type.

¹³ Per Title 24, Section 10-109(b)2B and Section 10-109(i)1.

- Enforce “responsible person” signatures by document and user type.
- Allow access to registered documents through various means given in JA7.
- Enable a user-input interface for authoring forms.
- Prohibit alternative input interfaces unless approved by the CEC.
- Accept protected compliance analysis output files that indicate a compliant status.
- Reject noncompliant or unprotected analysis output files.
- Apply data input calculations and validation per CEC's XML-based definitions.
- Manage revisions to compliance documents.
- Retain data specified in Section 10-103.3.
- Perform document configurations given in the DRRM. This ensures a logical sequencing of compliance form types that depend on user input from other documents.
- Apply document-specific sampling rules given in the DRRM, consistent with RA2.
- Apply registration provider amendments to compliance documents. These include the provider's digital signature, registration footer information on every page, and the provider's electronic signature with watermark.
- Follow conventions detailed in the DRRM to ensure compliance with JA7.5.4.2.
- Provide CEC oversight search tools. These include project search inputs and parameters as well as quality assurance reports.
- Produce a Project Status Report (PSR) that conforms to JA7.6.6.1.1.
- If the registry allows photographic documentation, comply with JA7.5.6.3.

The applicant will be granted access to a test instance of the CEC's Compliance Report Generator (RG) web service to aid in registry development and to perform the necessary self-testing.¹⁴ The RG validates standardized document data exchange files from CEC-approved software applications and data registries, then produces the document registration package required to complete the registration of compliance documents in data registries.

To accomplish this, the application should describe the process and criteria used for registry self-testing, and the applicant should submit evidence of successful self-testing of its data registry. Staff recommends but does not require that the following be submitted as evidence of a successful self-test:

- Model various buildings and project types (including newly constructed buildings, additions, and alterations) using the [CEC's compliance software](#)¹⁵ and simulate

¹⁴ A prospective applicant may email the CEC at Title24@energy.ca.gov to request access to the test instance of the report generator prior to submission of a residential data registry application.

¹⁵ Available at <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-energy-code-compliance-software>

completion of each project. Submit electronic copies of all the completed registered compliance documents.¹⁶ At least one copy of each compliance document that can be used for the performance compliance path should be submitted.¹⁷

- Model eight single-family residential newly constructed building projects in a subdivision using CEC-approved compliance software. Use a multi-orientation input file for each home. Simulate completion of all homes using a valid sampling method and submit electronic copies of all the completed registered compliance documents. Submit an electronic copy of the Project Status Report for each home.
- Create a newly constructed multifamily building project with at least eight dwelling units. Model the project using an approved compliance software and simulate completion of the documentation (though certificates of verification). Submit electronic copies of all completed registered compliance documents.
- Create prescriptive single-family residential newly constructed building projects and simulate completion of each project. Submit electronic copies of all completed registered compliance documents. At least one copy of each compliance document that is unique to the prescriptive compliance path should be submitted. Submit an electronic copy of the Project Status Report for each project.
- Create prescriptive addition projects and simulate completion of each project. Submit electronic copies of all completed registered compliance documents. At least one copy of each compliance document that is unique to the additions compliance path should be submitted. Submit an electronic copy of the Project Status Report for each project.
- Create prescriptive alteration projects and simulate completion of each project. Submit electronic copies of all completed registered compliance documents. At least one copy of each compliance document unique to the alterations compliance path should be submitted. Submit an electronic copy of the Project Status Report for each project.

The self-testing process described above is intended to encourage the applicant to generate all compliance documents required by the 2025 Energy Code. The introduction or scope of the data registry application should clarify which documents will be provided by its registry. The applicant can demonstrate its capabilities by submitting at least one copy of each compliance document type to the CEC for evaluation.¹⁸ The performance approach is one way to test a large number of compliance documents and should be used whenever possible. The prescriptive newly constructed buildings, additions, alterations, and nonresidential test projects

16 A registered compliance document is a compliance document that has been submitted to the applicant's data registry for retention, has been verified as complete by the data registry, and has completed the registration process such that that the document displays all applicable electronic signatures as well as the applicant's digital signature appearance and the unique registration number of the document.

17 Reference Joint Appendix JA7.8.2.2.

18 Not all Energy Code compliance documents need to be tested. Testing is only needed for documents that must be registered by a residential data registry. See Title 24, Part 1, Section 10-109(i)1A.

described above are intended to demonstrate proper implementation of compliance documents that are unique to those types of projects.

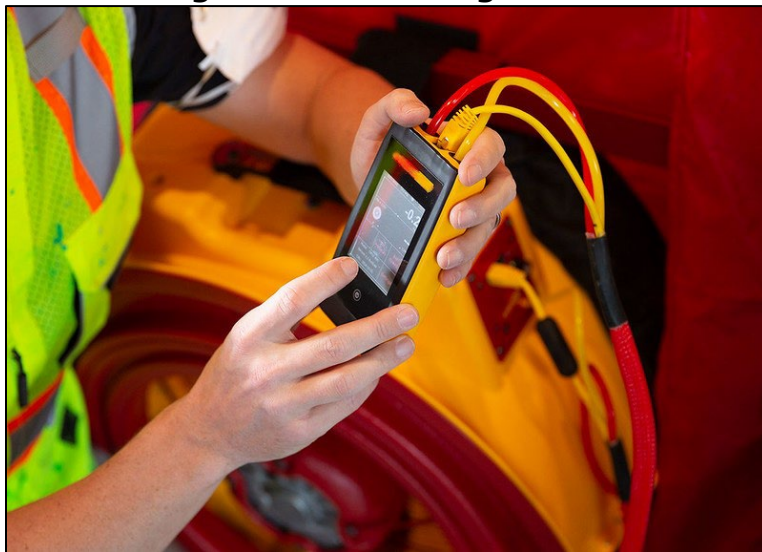
After registry self-testing is submitted, staff will perform acceptance testing of the proposed data registry to determine whether it complies with all regulations and is ready for approval.¹⁹ Document types that are listed are subject to staff testing, especially for versatile form types or when a type was excluded from the self-testing submission. Acceptance testing will include simulation of normal registry operation, including performing as various user types, creating new projects, entering installation data, validating calculations, entering FV&DT test results, and downloading completed compliance documentation.

Guidance About the Project Status Report (PSR)

The registry application must meet the requirements of JA7.5.6.1 comprehensively. The DRRM (Section 6.2.2) provides additional guidance as not all tested measures or allowable test methods are known at many stages of the documentation process.

Mandatory measures depend on the scope of the alteration and the system types indicated. These are not the same as mandatory features as found in Title 24, Section 110.1. Instead, mandatory refers to measures and features indicated on the certificates of compliance, as well as certificates of installation that include cues for certain ECC-verified tests.

Figure 3: Performing FV&DT



A person reading the display for air flow and pressure measurements collected by the blower door testing instrument.

Source: California Energy Commission

¹⁹ Reference Joint Appendix JA7.8.

CHAPTER 4:

Review and Approval Process

As previously stated, to expedite the review process, the provider and data registry applications should be submitted simultaneously and will undergo a parallel review process. Before January 1, 2026: one process is required by the HERS regulations, specifically Section 1674(c), and the other by the 2022 Energy Code, specifically Section 10-110. Beginning January 1, 2026: both processes follow the 2025 Energy Code, Section 10-110. While the review process for each application is similar, they are not identical in ways that could affect the parallel process.

Provisions such as conditional and updated approvals described in Section 10-103.3(c) are not in effect and will not be available to applicants in calendar year 2025.

Approval of a data registry under a new Energy Code version requires full approval. Registry application amendments and the streamlined approval were excluded from this report.

ECC-Provider Application Review Process

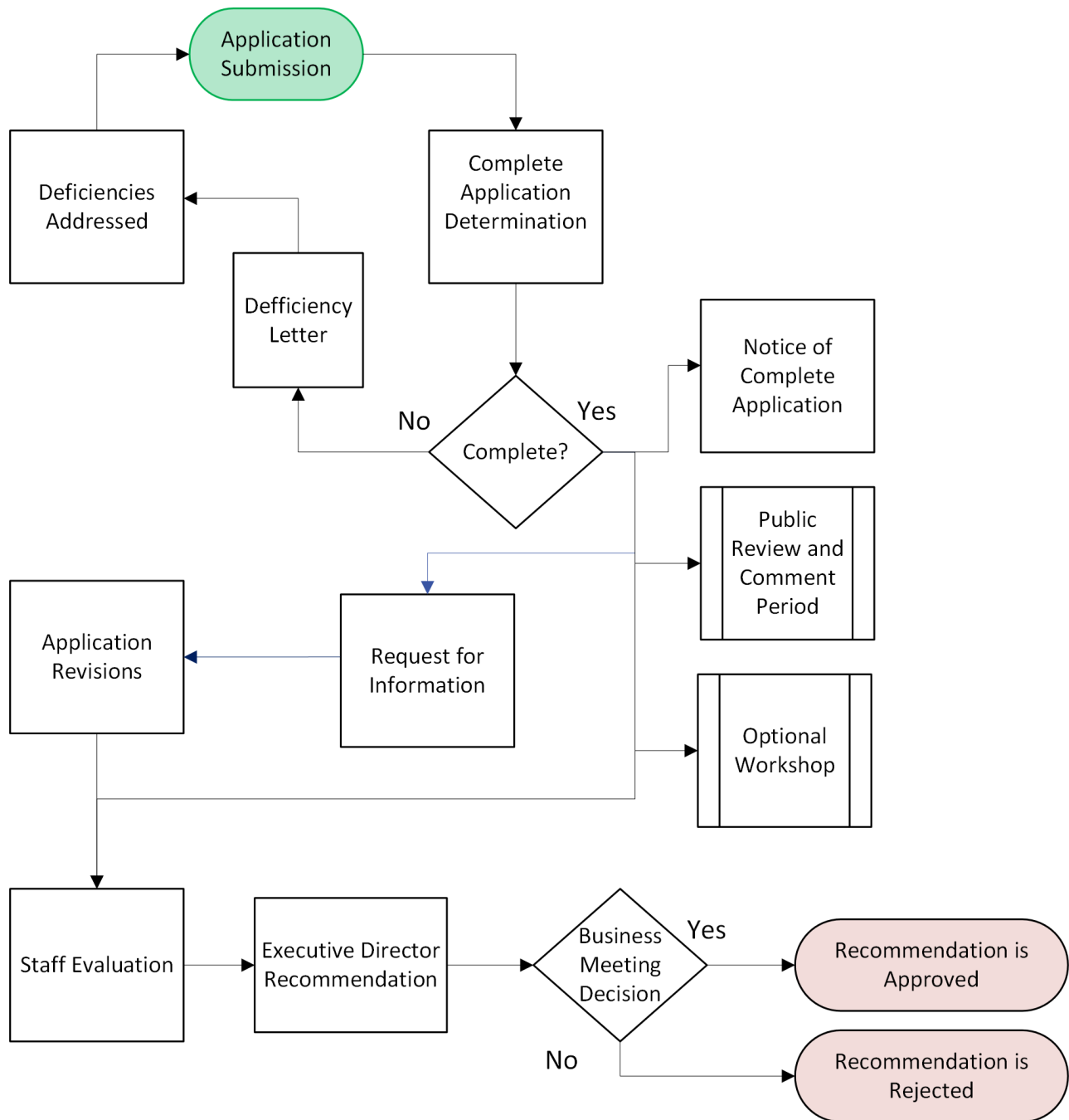
Full CEC approval as described in Title 24, Part 1, Section 10-103.3(c) is necessary for this inaugural ECC-Provider application cycle and initial ECC-Provider approvals. The CEC shall approve the provider application if it confirms the findings of the executive director.²⁰ The CEC will consider the executive director's recommendation at the next business meeting after submission of the recommendation.²¹ The CEC's executive director must determine that applicant meets applicable requirements of Title 20, Sections 1672 and 1673, and Title 24, Part 1, Sections 10-103.3, 10-109, and the Reference Appendices.

Full application reviews will follow the process outlined in Figure 4: Joint Application Review Process.

²⁰ 20 CCR 1674(c)(6), while effective.

²¹ 24 CCR 10-110(f).

Figure 4: Joint Application Review Process



Source: CEC staff

Table 4 describes the governing regulations and staff actions at each of the application review milestones.

Table 4: Joint Application Review Process

Activity or Milestone	Provider Application, only until 1/1/2026 Title 20 References	Registry Application (and Provider Application, starting 1/1/2026) Title 24 References	CEC Staff Action
Submission of Applications	Section 1674(a)	Section 10-110	Begin review process relying on the checklist provided by the applicant. Confidential submissions require one to two days to access.
Evaluation for Completeness	1674(c)(1) – no time limit to determine completeness.	10-110(a) – determine completeness within 75 days of the submission of the application.	Staff will notify the applicant by letter of the determination of completeness.
Determination of incomplete application	Implied	Implied	If additional information is required to make an application package complete, the applicant will be notified in writing.
Notice of Complete Application Comment Period	1674(c)2 – no time limit	10-110(b) – must be between 15-60 days	Staff will publish: <ul style="list-style-type: none"> • Completeness Evaluation • Notice of Availability

Activity or Milestone	Provider Application, only until 1/1/2026 Title 20 References	Registry Application (and Provider Application, starting 1/1/2026) Title 24 References	CEC Staff Action
Request for Information	1674(c)(1) – no time limit	10-110(c) – Requests must be made within 75 days of completeness. Awaiting requests "pauses the clock" on regulated time limits.	Staff will issue a Request for Information letter to the applicant if required. Staff will evaluate the complete application parts. Staff may request additional information more than once.
Workshop (optional)	1674(c)(2) – no time limit	10-110(d) – A workshop is optional but must be held within 75 days of completeness.	Staff will plan the workshop and develop all necessary presentations and other materials needed including a public notice.
Final Staff Evaluation	Not required, but if prepared other time limits still apply.	Not required, but if prepared other time limits still apply.	Final Staff Evaluation to be completed as part of the public record and to inform the staff recommendation of the executive director.

Activity or Milestone	Provider Application, only until 1/1/2026 Title 20 References	Registry Application (and Provider Application, starting 1/1/2026) Title 24 References	CEC Staff Action
Staff Recommendation to the Executive Director	This precedes the 1674(c)(3) – Recommendation, which must be issued to the applicant within 90 business days of receiving the complete application.	This is prepared ahead of the 10-110(e) recommendation and is appended to the Executive Director Recommendation.	Staff will develop the staff recommendation based on the final staff evaluation.
Executive Director Recommendation to the Commission	1674(c)(3) – Recommendation must be reached within 90 business days of receiving the complete application. 1674(c)(4) requires a recommendation if 1672 and 1673 requirements are met, however, the recommendation will rely on meeting 10-103.3(c) requirements.	10-110(e) – Recommendation must be made within the latest of: <ul style="list-style-type: none">• 90 days after completeness is determined.• 30 days after response to request for information.• 60 days after the close of comment for the workshop.	Revise staff recommendation if necessary. If approved, staff must mail a copy of the staff recommendation to the applicant (1674(c)(3) and 1674(c)(5)). Note that the parallel recommendations are subjected to both limits (either 90 business days or 30/60/90 calendar days).

Activity or Milestone	Provider Application, only until 1/1/2026 Title 20 References	Registry Application (and Provider Application, starting 1/1/2026) Title 24 References	CEC Staff Action
Business Meeting Notice	Section 1209(a) indicates "at least ten days before the event."	Title 20, Section 1209(a), indicates "at least ten days before the event." The consideration of both applications at the same event is necessary because the residential data registry must be owned by an ECC Provider.	Staff submits an agenda item request several weeks ahead of the event to ensure timely notice. Supporting documents (draft order for approval, signed recommendation, staff presentation) will be posted at least one day before the meeting.
Business Meeting Final Decision	1674(c)(5) – The executive director's recommendation will be acted on at the next CEC business meeting at least 15 business days after the recommendation was mailed to the applicant.	10-110(f) – The executive director's recommendation will be acted on at the next CEC business meeting.	Staff will develop all necessary business meeting documents and presentations and place the item on the CEC business meeting agenda for consideration.

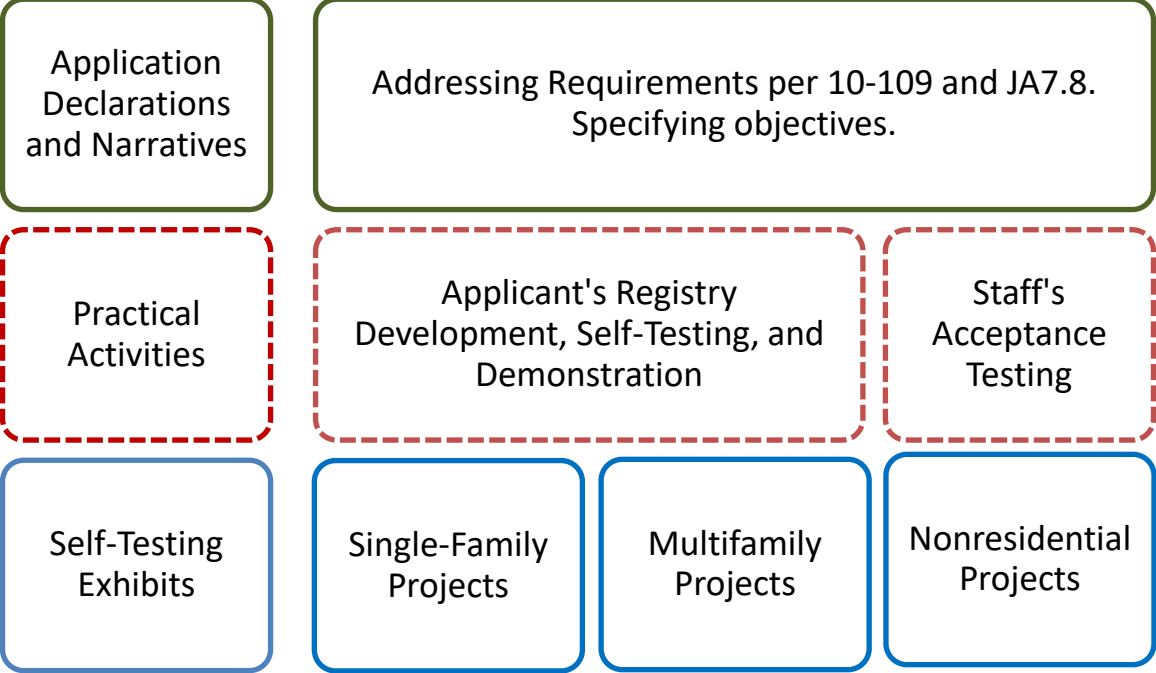
Source: CEC staff

Data Registry Evaluation Process

Staff will conduct a conceptual evaluation of the narrative aspects of the application. A clear scope of application will reduce the time needed to seek clarification in later stages of review.

Staff will also test the proposed registry to a limited extent to confirm that the registry meets the requirements given by JA7 (and further explained in the DRRM). These activities will be supported by examples of compliance documents prepared by the applicant and submitted as part of the data registry application. This work will be partitioned and categorized as represented in the graphic below:

Figure 5: Data Registry Evaluation Components



Source: CEC staff

The DRRM provides guidance, conventions, and other details that ensure the registry will enable required forms, control group sampling options, and explain the registration process using the CEC's infrastructure. Staff will use the DRRM as a reference but will defer any questions about compliance back to the Energy Code (Title 24, Parts 1 and 6, and the Reference Appendices).

The 2025 Energy Code update to the DRRM removes references to the approved certificate authorities that were previously issued by the Secretary of State. Through a rulemaking, the listing has been replaced with language that describes the use of "acceptable technologies" for digital signatures placed on applicable documents. For more information, refer to the California Code of Regulations, Title 2, Division 7, Chapter 10, Sections 22000 through 22005.

Other Notable Changes

- The removal of group sampling from existing building projects.
- The removal of fault indicator displays (FID) as a refrigerant charge verification option. (RA3.4.2.) This removes FID-specific sections from some compliance forms and one entire certificate of verification. For indoor air quality FID verification, the protocol is provided in JA17.
- Replacement of "HERS" with "ECC" or other FV&DT-related terminology as appropriate.
- The return of multipoint envelope airflow leakage measurements.
- The removal of duct sealing FV&DT in high-rise multifamily buildings (NA2.1).

Staff will review the application submissions and the pre-approved registry to ensure that the applicant has observed key changes in addition to typical requirements.

Ultimately, staff will compare the submitted exhibits with the regulatory requirements listed in registry-related parts of the Checklist for Applicants.

APPENDIX A:

Checklist for Applicants

The ECC-Provider and Data Registry Application Checklist is a separate file designed to assist the applicant and staff. The checklist identifies each requirement by regulation reference and cites the regulation in part or entirely. Each checklist item provides optional recommendations to applicants and is intended as an application and evaluation guide. Staff recommends that the applicant use the columns provided to identify the location in one or more application filings that describes how the code requirement is being met.

The checklist corresponding to this staff report is available on the [CEC website](#) in tandem with this staff report. CEC staff encourages the applicant to refer to the checklist then enter information where indicated. Doing so is not required for application approval.

APPENDIX B:

Glossary of Terms

Many of these terms are officially defined in the 2025 Energy Code (including Part 1, Section 102, and Reference Joint Appendix, Sections JA1 and JA7.2). The descriptions provided here are not necessarily verbatim from those sources in the interest of relevance to the ECC Program.

Table 5: Glossary of Terms

Term	Description
Alternative Calculation Method <ul style="list-style-type: none"> • ACM 	Compliance software, alternative component packages, or exceptional methods that are approved by the CEC under Section 10-109. Primarily, the calculation is performed using CEC-approved compliance software to show compliance for a design that deviates from prescriptive requirements.
Authority having jurisdiction <ul style="list-style-type: none"> • AHJ 	The entity that issues building permits, performs building inspections, issues building citations, and issues certificates of occupancy. They are generally county, city, or town building departments but may include state agencies as well. Referred to in the Energy Code as an enforcement agency.
California Code of Regulations <ul style="list-style-type: none"> • CCR 	Official compilation and publication of the regulations adopted, amended, or repealed by state agencies under the Administrative Procedure Act. Properly adopted regulations that have been filed with the Secretary of State have the force of law.
California Energy Commission <ul style="list-style-type: none"> • CEC 	The California State Energy Resources Conservation and Development Commission is the state's primary energy policy and planning agency. The CEC is committed to reducing energy costs, curtailing greenhouse gas emissions, and ensuring a safe, resilient, and reliable supply of energy.
Certificate of Compliance <ul style="list-style-type: none"> • CF1R and LMCC Certificate of Installation <ul style="list-style-type: none"> • CF2R and LMCI Certificate of Verification <ul style="list-style-type: none"> • CF3R, LMCV, and NRCV 	Compliance documents (that begin as compliance forms) required to be submitted to the AHJ at various points during a project's permit cycle. The indicated certificate types must be produced using an ECC-Provider's residential data registry unless the form's title states otherwise.

Term	Description
Compliance Approach	Allowable methods by which the design and construction of a building may be demonstrated to comply with Title 24, Part 6. The default compliance approach assumes prescriptively defined standards, while the alternative calculation method is available using the performance approach. The requirements for each compliance approach are set forth in Section 100.0(e)2 of Part 6.
Compliance Report Generator <ul style="list-style-type: none"> • RG 	A service for consistent document data validation transmitted by CEC-approved software applications and Data Registries. The RG produces the compliance registration package required to complete the registration of compliance documents in Data Registries.
Data Registry Requirements Manual <ul style="list-style-type: none"> • DRRM 	A document that provides guidance regarding the functional and technical aspects of the data registry requirements given in Reference Joint Appendix JA7.
Energy Code	California Building Code Title 24, Part 1, Part 6, and the Reference Appendices. Contains energy and water efficiency and conservation requirements for newly constructed buildings; and additions and alterations to existing buildings.
Energy Code Compliance Program <ul style="list-style-type: none"> • ECC Program 	The program for field verification and diagnostic testing for residential construction as set forth in Section 10-103.3 to verify that newly constructed buildings and additions and alterations to existing buildings comply with the requirements of the Energy Code.
Energy Code Compliance Provider <ul style="list-style-type: none"> • ECC-Provider 	An organization approved by the Commission to administer the ECC program pursuant to the requirements of Section 10-103.3.
Energy Code Compliance Rater <ul style="list-style-type: none"> • ECC-Rater 	A person trained, tested, and certified by an ECC-Provider to perform field verification and diagnostic testing for the ECC program under the requirements of Section 10-103.3.
Energy Code Compliance Rater Company <ul style="list-style-type: none"> • ECC-Rater Company 	An organization certified by an ECC-Provider to offer field verification and diagnostic testing services by the ECC-Rater Company's ECC-Raters for the ECC program pursuant to the requirements of Section 10-103.3.
Exemplary ECC-Rater	An ECC-Rater that has achieved the status of "Exemplary" as set forth in Section 10-103.3(d)5B.

Term	Description
External Digital Data Source <ul style="list-style-type: none"> • EDDS 	A data transfer service approved by the CEC to operate in conjunction with an approved data registry that allows authorized users to transfer data from a digital data source external to the data registry as an alternative to the key-in data entry for registering compliance documents.
Field Verification and Diagnostic Testing <ul style="list-style-type: none"> • FV&DT 	Measurements and observations performed by installers and raters according to protocols specified in the Title 24 Reference Appendices, the results of which are entered into a residential data registry.
HERS Program Regulations	California Code of Regulations Title 20, Division 2, Chapter 4, Article 8, Sections 1670 <i>et seq.</i> The HERS Regulations implement the requirements of Public Resources Code Section 25942. These regulations establish the administrative requirements for the HERS Program regarding both the voluntary whole house rating system intended to educate homeowners about energy efficiency opportunities in their homes and, until the 2025 Energy Code becomes effective, mandatory field verification and diagnostic testing for Title 24 Energy Code compliance.
HERS Provider	An organization that administers a home energy rating system as described in Title 20, Chapter 4, Article 8, Section 1670.
HERS Technical Manual <ul style="list-style-type: none"> • HTM 	<p>Publication number: CEC-400-2008-012, December 2008. This technical manual explains the requirements for the HERS program, including requirements for HERS providers, modeling procedures and assumptions for HERS software, and procedures for California whole-house home energy raters.</p> <p>It has little relevance to the ECC Program but contains procedures for verifying existing conditions of a home that are not contained in the Reference Appendices.</p>
Home Energy Rating System <ul style="list-style-type: none"> • HERS 	Described in Title 20, Chapter 4, Article 8, Section 1670. The HERS program consists of providers that train and certify raters to perform whole house ratings, as well as field verification and diagnostic testing as a third-party to the contractor on a construction project. The providers and raters are responsible for registering the testing results in the provider's data registry.
Long-Term System Cost <ul style="list-style-type: none"> • LCS 	The CEC-projected (not predicted for any individual utility customer) present value of costs to California's energy systems over a period of 30 years.

Term	Description
Rater of Record <ul style="list-style-type: none"> • ROR 	The ECC-Rater or Rater Company that has registered a failed test on a project becomes that project's ROR. Title 24, Section 10-103.3(b)1Aviii explains this designation.
Reference Appendices	Support text for the Energy Code and relied on by the Data Registry Requirements Manual. The CEC-adopted document consists of three parts: <ul style="list-style-type: none"> • Reference Joint Appendices (JA) • Reference Residential Appendices (RA) • Reference Nonresidential Appendices (NA)
Residential Data Registry	An internet-based service for authorized users that provides compliance document registration required by Part 6, including residential compliance forms and the nonresidential Certificates of Verification. A data registry is maintained by an ECC-Provider and must be approved by the CEC.
XML schema definitions <ul style="list-style-type: none"> • XSD 	Refers to Extensible Markup Language (XML) schema Definitions, commonly referred to as XSD, which is another standard defined by the World Wide Web Consortium. An XML schema utilizes multiple XSD files to define a set of rules to which an XML document and its data elements must conform to be considered valid by the registry and by the Report Generator. The rules include definitions of document sections such as headers, signatures, footers, and input fields, definitions of data elements and attributed data types, constraints on user inputs and calculated values, and whether data is required or optional.

APPENDIX C:

ECC-Rater Company Responsibilities

Introduction

This section is intended for those companies that are seeking ECC-Rater Company certification for the 2025 Energy Code cycle. ECC-Rater Companies are organizations certified by an ECC-Provider to offer field verification and diagnostic testing services by the ECC-Rater Company's employed ECC-Raters under the requirements of Section 10-103.3. An ECC-Rater Company may employ one or many ECC-Raters, or an ECC-Rater may be its own company (an Independent Rater) and take on the responsibilities of an ECC-Rater Company.

Each ECC-Provider establishes its own ECC-Rater Company certification process, which was approved by the CEC during the ECC-Provider application process. Those interested in applying for ECC-Rater Company certification must contact a CEC-approved ECC-Provider and follow its application process and complete its requirements. Once approved, the ECC-Rater Company must comply with the responsibilities specified in the ECC-Program regulations discussed in this appendix.

Approval Process

ECC-Rater Company applicants must apply to a CEC-approved ECC-Provider pursuant to the application process established by the ECC-Provider. The minimum certification requirements are codified in the Energy Code, Part 1, Section 10-103.3(d)4, ECC-Provider Responsibilities, ECC-Rater Company Certification. The certification itself is performed by the ECC-Provider regarding all aspects of the ECC-Rater Company Certification application. The California Energy Commission itself does not certify ECC-Rater Companies.

1. The minimum application requirements must be verified by the ECC-Provider and the ECC-Rater Company applicant must complete and pass all training requirements.
2. An ECC-Rater Company is eligible if it meets the minimum qualifications enumerated in Section 10-103.3(f)1B and has not been prohibited from practicing by the Executive Director or California Energy Commission pursuant to Section 10-103.3(g)2.
3. After its initial certification, an ECC-Rater Company does not need to complete the training curriculum again or be recertified for each Triennial Code Cycle, so long as it maintains its eligibility under Section 10-103.3(f)1B.
4. The ECC-Provider must maintain a list of all certified ECC-Raters Companies with the following information: first and last name of the certified primary, ECC-Rater Company Name, business contact information (phone, address, and email), and the certification status associated with the ECC-Rater Company (Certified-Active, Exemplary-Active, Notice of Violation, Probation, Suspended, Decertified, or inactive).
5. The ECC-Provider must also maintain any Declarations of ECC-Rater Company Separation of Services in its data registry.

Minimum Application Requirements

These requirements are codified in the 2025 Energy Code, Part 1, Section 10-103.3(f)1, ECC-Rater Company Certification.

Minimum Qualifications

At least one principal of the ECC-Rater Company applicant must hold an active ECC-Rater certification issued by a CEC-approved ECC-Provider or be actively pursuing certification as evidenced by enrollment in training courses. "A principal of an ECC-Rater Company is defined as a senior management-level employee and is not limited to an owner or shareholder of the ECC-Rater Company."²²

ECC-Rater Company Agreement

Before being certified, the ECC-Rater Company applicant must sign an agreement with the ECC-Provider in which the ECC-Rater Company must agree, at minimum, to comply with all applicable laws and regulations, including but not limited to the requirements provided in Section 10-103.3.

Minimum Training Requirements

Before being certified, the ECC-Rater Company applicant must complete all required training required by the ECC-Provider. The minimum training requirements are codified in the Energy Code, Part 1, Section 10-103.3(d)3, ECC-Provider Responsibilities, ECC-Rater Company Training. ECC-Providers may add requirements to the ECC-Rater Company training at its discretion, but all training materials must be approved by the CEC. This training may be updated for each triennial code cycle or as needed but must still be approved by the California Energy Commission.

The primary objective is to develop a course of training to summarize the responsibilities of the ECC-Rater Company in the performance of field verifications and diagnostic testing as prescribed in Section 10-103.3(d)3. The ECC-Rater Company training may not exceed eight (8) hours in duration and must, at minimum, include the following:

1. A summary of the training curriculum for ECC-Rater applicants (Section 10-103.3(d)1).
2. Roles and responsibilities of all entities regulated by Section 10-103.3 (ECC-Provider, ECC-Rater, and ECC-Rater Company) or the Energy Code and Reference Appendices (contractors, builders, authorities having jurisdiction [AHJ]).
3. The required conduct for ECC-Rater Companies (Section 10-103.3(f)2)
Note: this requirement is codified in Section 10-103.3(d)4A.
4. Discipline procedure for ECC-Raters (Section 10-103.3(d)7), ECC-Rater Companies (Section 10-103.3(d)8) and the appeal process (Section 10-103.3(h)).
5. The Quality Assurance process (Section 10-103.3(d)5).
6. The Conflict of Interest requirements (Section 10-103.3(b)1).
7. Prohibition on false, inaccurate, or incomplete information (Section 10-103.3(b)2).

²² Title 24, Part 1, Section 10-103.3(f)1B

ECC-Rater Company Responsibilities

The responsibilities of the ECC-Rater Company are codified in the Energy Code, Part 1, Section 10-103.3(f)2, ECC-Rater Company Certification and Responsibilities, Required Conduct. The objective of these requirements is to ensure that the ECC-Rater Company supports and does not hinder the ECC-Rater in the performance of field verification and diagnostic testing.

1. ECC-Rater Companies are limited to a view-access only regarding the compliance documents registered by the ECC-Raters it employs and may not change data entered into the data registry for any certificate of verification. Section 10-103(a)5 specifies that only the ECC-Rater who performed the FV&DT may sign as the *responsible person*.
2. ECC-Rater Companies may sign the certificate(s) of compliance and certificate(s) of installation per Sections 10-103(a)1 and 10-103(a)3, as the *document author* but may not sign as the responsible person or installing technician.
3. An ECC-Rater Company may sign the certificate of installation as the "authorized representative" only if a qualified party has delegated signature authority to the ECC-Rater Company, as described in Section 10-103(a)3A.
4. The ECC-Rater Company must use the data registry user interface or an CEC-approved external digital data source for data input into the data registry.
5. Annual reporting (March 31 of each year) to the California Energy Commission:
 - a. ECC-Rater Company contact details, principals, and required certifications.
 - b. A list of all ECC-Raters working for the ECC-Rater Company.
 - c. The total number of field verifications and diagnostic tests performed organized by enforcement agency.
 - d. The total and average cost of services charged for each type of field verification and diagnostic test performed.
6. ECC-Rater Companies are responsible for assuring all of its ECC-Raters comply with the regulations when providing field verification and diagnostic testing services.
7. The ECC-Rater Company must support the ECC-Rater progressive discipline requirements of Section 10-103.3(d)7 as follows:
 - a. Notice of violation. The ECC-Rater Company must ensure the ECC-Rater complies with any corrective action and reimbursement of costs prescribed in the notice of violation within the time frame provided in the notice of violation. The ECC-Rater Company must facilitate any refund to a homeowner.
 - b. Probation. The ECC-Rater Company must ensure the ECC-Rater complies with any training and tests and reimbursement of costs prescribed in the notice of probation within the time provided in the notice of probation. The ECC-Rater Company must not assign any new work to the ECC-Rater until probation is lifted.
 - c. Suspension. The ECC-Rater Company must ensure the ECC-Rater complies with the terms of suspension prescribed in the notice of suspension.
 - d. Decertification. The ECC-Rater Company must ensure the decertified ECC-Rater does not perform any FV&DT services.

8. ECC-Rater Companies may not provide untrue, inaccurate, or incomplete field verification and diagnostic test information or report field verification and diagnostic test results that did not comply with the regulations.
9. ECC-Rater Companies may not accept payment or other consideration in exchange for reporting a field verification and diagnostic test result not conducted and reported in compliance with the regulations in Section 10-103.3.
10. ECC-Rater Companies must comply with the conflict-of-interest prohibitions set forth in Section 10-103.3(b)1.
11. The ECC-Rater Company may not provide additional project services beyond field verification and diagnostic testing or as provided in Sections 10-103.3(f)2D and 10-103.3(f)2Di, including design, construction management, permitting, or responsible person signatories, unless the ECC-Rater Company submits a *Declaration of ECC-Rater Company Separation of Services* to the ECC-Provider, as provided in Section 10-103.3(f)2Diii (see below for more information).

Declaration of ECC-Rater Company Separation of Services

The *Declaration of ECC-Rater Company Separation of Services* is an optional declaration that the ECC-Rater Company may file with the ECC-Provider that allows the company to provide services other than FV&DT as described by Section 10-103.3(f)2Diii. This declaration shows the ECC-Provider that its ECC-Rater(s) complies with the requirements in Section 10-103.3(b)1 and is independent (and acting as a third party) from other person(s) employed or contracted by the ECC-Rater Company.²³ These other persons might provide services beyond FV&DT including design, construction management, permit handling, or responsible person signatories on the same project.

This declaration must consist of the following elements:

1. The ECC-Rater Company must show proof that the person(s) providing these additional services do not have management, hiring or termination, payment, or any other authority over the ECC-Rater, or direct the ECC-Rater activities in any regard within the same project(s).

The declared separation demonstrates that the ECC-Rater remains independent from the designer or developer, in this case, the person providing these services that works at the same ECC-Rater Company. The CEC expects there to be no collusion or coercion between these parties, but it is up to the ECC-Rater Company to provide a safe working environment that supports the ECC Program requirements.

There are many corporate designs that can provide this proof, such as designating an ethical wall between persons providing management FV&DT services and those providing all other project management support services.

2. The ECC-Rater Company must show proof that the person(s) providing these additional services is qualified to do so under Division 3 of the Business and Professions Code.

²³ Title 24, Part 1, Section 10-103(a)5

Section 10-103(a) requires that persons signing as the *responsible person* or installing technician have the education, experience, and licensure to do so. The requirements in Division 3 of the Business and Professions Code identify the minimum qualifications for individuals to testify that the design and installation of specific building components are compliant with the California Building Code (which includes the Energy Code). Persons providing services beyond FV&DT such as design, construction management, or permitting or responsible person signatories must have the appropriate licensure to do so, or they are not permitted to provide these services under this provision. Therefore, staff recommends that the necessary proof required includes the valid license for the individuals within the ECC-Rater Company that are providing these additional services.

3. The ECC-Rater Company must show proof that the person(s) providing signatory services under Section 10-103(a)1 and Section 10-103(a)3 will be legally responsible for design, construction, or installation in the applicable classification for the scope of work and will sign as the responsible person.

The person providing the responsible person service should actually be the person signing the certificate of compliance or certificate of installation and no other. The electronic signature service used by the ECC-Provider is generally sufficient for these purposes, but it is important for the signatory to understand that they are responsible for the errors and omissions should they sign.

4. The Declaration of ECC-Rater Company Separation of Services must be retained by the ECC-Provider.

This requirement is twofold. First, it requires that the ECC-Provider maintain the separation of services documentation. Second, the ECC-Rater Company must use this ECC-Provider to register the required compliance documentation. Staff emphasizes that the separation of services document can be changed from project to project, so the ECC-Provider should have a means of linking the separation of services to a specific project within its data registry.

APPENDIX D:

Documents Referenced

Energy Code and Supporting Manuals

[2022 Building Energy Efficiency Standards](#) (effective until December 31, 2025)

[2025 Building Energy Efficiency Standards](#) (effective January 1, 2026)

[2025 Reference Appendices for the 2025 Energy Code](#) (effective January 1, 2026)

[2025 Data Registry Requirements Manual](#)

[2025 Single-Family Compliance Manual](#)

[2025 Multifamily Compliance Manual](#)

California Code of Regulations, Title 20, Division 2, Chapter 4, Article 8

[HERS Program Regulations, Sections 1670–1675](#) (effective January 1, 2024)

[HERS Program Regulations, Sections 1670–1675](#) (effective January 1, 2026)

California Code of Regulations, Title 2, Division 7, Chapter 10

[Digital Signatures, Sections 22000–22005](#) (effective February 17, 2021)

California Code of Regulations, Title 24, Part 2

[California Building Code, Part 2, Volumes 1 & 2](#)

California Business and Professions Code

[Division 3, accessible on the California Legislative Information web site](#)

California Energy Commission

[Title 20 HERS Rulemaking Staff Report](#) (published January 2023)

[Title 24 FV&DT Rulemaking Final Staff Report](#) (published November 2023)

[Final Statement of Reasons](#) for the changes to the 2025 Energy Code (published January 22, 2025)

[HERS Technical Manual](#) (published December 2008)

[2025 Energy Code Compliance Software](#)