DOCKETED	
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Project Title:	2025 Energy Code Compliance Provider Applications
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Description:	N/A
Filer:	Jonathan Johnson
Organization:	Golden State Registry
Submitter Role:	Applicant
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## **APPLICATION FOR CONFIDENTIAL DESIGNATION (CEC-13)**

#### **Public Document**

Docket: 25-BSTD-01 — 2025 Energy Code Compliance Provider and Data Registry Applications

Date: September 17, 2025

### 1. Contact Information (20 CCR 1208.1)

Applicant Name: National Energy Testing Institute, Inc. (DBA Golden State Registry)

Primary Contact: Jonathan Johnson, Chief Executive Officer

Address: 430 Villa Point Drive, Newport Beach, CA 92660

Phone Number: 805-201-9047

E-mail: jon@gsregistry.org

Alternate Contact: Eric Jacoby, Chief Financial Officer / Secretary — eric@gsregistry.org

### 2. Title and Description of the Record; Location of Confidential Information

Title of Record: ECC-R — Registry Application (R1 & R2)

Description: Confidential application describing the Registry's system operations, document lifecycle controls, electronic signature workflows, validation logic, data-management practices, and related technical/operational methods.

Exact Location in the Record: Confidential content appears in the technical narratives and examples of ECC-R\_RegistryApplication\_GSR\_v1\_2025-09-17.docx / ECC-R\_RegistryApplication\_GSR\_v1\_2025-09-17.pdf, including sections covering security controls, validation gates, signature mechanisms, and any embedded examples/screenshots that may contain personal/identifying information.

### 3. Date of Record; Docket/Proceeding

Date the Record Was Created: September 17, 2025

Docket/Proceeding: 25-BSTD-01 — 2025 Energy Code Compliance Provider and Data Registry Applications

## 4. Length of Time the Information Should Be Kept Confidential (20 CCR 2505(a)(1)(C))

Requested Duration: Six (6) years (two code cycles) consistent with prior practice; alternatively, continuing confidential treatment for as long as the material remains proprietary trade secret content and/or contains personal/identifying information.

# 5. Justification — Why the Information Should Not Be Disclosed (20 CCR 2505(a)(1)(D))

The record contains trade secrets and proprietary methods (inner workings of the Registry software) and examples/screenshots that may include personal/identifying information. Disclosure would enable reverse engineering, compromise system integrity, and cause competitive harm; because digital duplication is trivial, dissemination would be widespread and irreversible.

## 6. Substantiation — Factors Supporting Confidential Treatment (20 CCR 2505(a)(1)(D))

- The value of the information derives from being unknown; it is not publicly available and reflects non-public design and operational methods.
- Disclosure would compromise security controls and enable reverse engineering, harming GSR's competitive position and the program's integrity.
- Screenshots/examples may contain personal/identifying information; disclosure would create privacy and security risks for individuals.
- The CEC has full access for regulatory review; public disclosure would not materially benefit the public interest.

### 7. Aggregation or Masking (20 CCR 2505(a)(1)(E))

A public version suitable for docketing (or, alternatively, a public summary) will be provided with sensitive content redacted. Redactions include trade secret technical details and personal/identifying information.

### 8. Confidential Handling and Disclosure History (20 CCR 2505(a)(1)(F))

The confidential Application is maintained in restricted-access systems and shared only with authorized personnel. It has not been publicly disclosed. It is provided to the CEC solely for application review.

#### 9. Certification (20 CCR 2505(a)(1)(G))

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge.

### 10. Entity Type and Authorization (20 CCR 2505(a)(1)(G))

Applicant is a California corporation: National Energy Testing Institute, Inc. (DBA Golden State Registry). The undersigned is authorized to make this application and certification on behalf of the company.

Authorized Signatory:

Name: Jonathan Johnson Title: Chief Executive Officer

Signature: \_\_\_\_\_\_ Date: <u>9/18/2025</u>