

DOCKETED

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Project Title:	2025 Energy Code Compliance Provider Applications
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Document Title:	Application for Confidentiality Ex T5 and T6
Description:	N/A
Filer:	Jonathan Johnson
Organization:	Golden State Registry
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CONFIDENTIALITY REQUEST

Exhibits T5 and T6

California Energy Commission

Docket Office

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Submitted By:

Golden State Registry (GSR)

430 Villa Point Dr, Newport Beach, CA 92660

805-201-9047

Re: Confidentiality Request for Exhibits T5 and T6

Docket Number: 25-BSTD-01

Authority: Title 20, California Code of Regulations, §§ 2501–2505

I. Introduction

Golden State Registry (“GSR”) respectfully requests that the California Energy Commission (“Commission”) grant confidential designation to specific materials included in its Energy Code Compliance (ECC) Provider Application submitted under Docket 25-BSTD-01.

This request is made pursuant to Title 20, California Code of Regulations, §§ 2501–2505, as well as Government Code § 6254(k) and Evidence Code § 1060, which authorize confidentiality protection for trade secrets and proprietary business information.

The materials for which confidentiality is sought are Exhibits T5 and T6.

II. Materials for Which Confidentiality Is Requested

GSR seeks confidential treatment for the following documents:

1. Exhibit T5 – Field Training Program Curriculum & Procedures

This exhibit contains proprietary and non-public information including:

- Training curriculum structure and methods
- Instructional and assessment techniques
- Remediation procedures
- Internal program sequencing and operational flow
- Competency standards and scoring tools
- Specialized equipment usage and training resources

2. Exhibit T6 – Field Training Facility Description

This exhibit contains detailed, non-public information including:

- Facility configuration, layout, and operational characteristics
- Equipment placement, ratios, and resource planning
- Photographs and descriptions of the training environment
- Facility-use methodologies and safety system deployment
- Details of non-public training infrastructure developed by GSR

Both exhibits reveal proprietary instructional systems and facility methods that constitute trade secrets under California law.

III. Basis for Confidentiality

The information contained in Exhibits T5 and T6 qualifies as protected confidential material and trade secret information under:

- Evidence Code § 1060
- Government Code § 6254(k)
- Title 20 CCR § 2501(a)(1)(E)

Disclosure of these materials would cause substantial competitive harm because:

1. The exhibits contain proprietary training methodologies and internal processes developed at significant expense.
2. Competing providers would gain access to GSR's curriculum structure, testing methods, staff evaluation tools, and program sequencing.
3. Field training facility configurations, layouts, and operational deployment strategies are not publicly available and would enable direct replication.
4. Competitors could use this information to bypass the cost, time, and expertise required to develop an equivalent program.

These exhibits therefore meet the statutory definition of trade secrets.

IV. Why Redaction Is Not Feasible

Redaction is not a viable option because:

- The confidential material is intrinsic to every substantive component of Exhibits T5 and T6.
- Removal of the sensitive elements would render the documents incomplete and unusable for Commission review.
- Redaction would eliminate the very elements needed by Commission staff to evaluate GSR's training program and facility.

Confidential designation of the full exhibits is therefore necessary.

V. Duration of Confidentiality Requested

GSR requests confidential treatment for the duration of the **2025–2028 Energy Code cycle**. This duration is consistent with the Commission's historical treatment of training materials, testing standards, and internal program documents submitted by previous HERS/ECC Providers.

VI. Access to Confidential Materials

Access should be limited to:

- Commission staff assigned to the ECC Provider Application review
- Individuals authorized by the Commission under nondisclosure provisions
- GSR personnel responsible for the application
- Others legally entitled under Title 20 CCR § 2505

No other external parties are authorized to receive or review these materials.



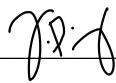
VII. Certification

I certify under penalty of perjury that the information for which confidentiality is sought is true, correct, and complete to the best of my knowledge; that the information is maintained as confidential by GSR; that it is not publicly available; and that disclosure would cause competitive disadvantage and harm to GSR.

Name: Jonathan Johnson

Title: CEO, Golden State Registry

Date: 11/25/2025

Signature: _____