

DOCKETED	
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Project Title:	2025 Energy Code Compliance Provider Applications
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Document Title:	GSR Exhibit P Confidentiality Request
Description:	N/A
Filer:	Jonathan Johnson
Organization:	Golden State Registry
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CONFIDENTIALITY REQUEST

ECC-Provider Application – Exhibit P

Docket 25-BSTD-01

Submitted To:
California Energy Commission
Docket Office
1516 Ninth Street, MS-4
Sacramento, California 95814

Submitted By:
National Energy Testing Institute, Inc.
DBA Golden State Registry (“GSR”)

Authority: Title 20 CCR §§2501–2505; Government Code §6254(k); Evidence Code §1060

I. INTRODUCTION

National Energy Testing Institute, Inc., doing business as Golden State Registry (“GSR”), hereby requests confidential designation for its **ECC-Provider Application (Exhibit P)** submitted under Docket 25-BSTD-01

This request is made pursuant to:

- Title 20, California Code of Regulations §§2501–2505
- Government Code §6254(k)
- Evidence Code §1060

The ECC-Provider Application contains proprietary operational, technological, procedural, and security architecture information that constitutes confidential business information and trade secrets under California law.

II. MATERIAL FOR WHICH CONFIDENTIALITY IS REQUESTED

GSR seeks confidential treatment for the full document:

ECC Application – P Provider Application
National Energy Testing Institute, Inc. DBA Golden State Registry
Docket 25-BSTD-01

Document Name: ECC-P_Provider_Application_GSR_v1_2025-09-17

Document Length: 103 Pages

The document contains detailed, non-public information including but not limited to:

1. Registry Technical Architecture

- Cloud hosting environment description
- Encryption standards (in transit and at rest)
- Immutable audit log design
- Role-based access control logic
- MFA enforcement architecture
- Disaster recovery design (RTO/RPO specifications)
- Repository transmission readiness protocols

2. Compliance Workflow Enforcement Logic

- Certificate lifecycle gating mechanisms
- Rater of Record locking logic
- Correction and superseding document architecture
- Conflict-of-interest detection controls
- QA flag triggers
- System-level signing restrictions

3. Internal Quality Assurance Infrastructure

- Audit classification methodology
- Escalation thresholds
- Remediation protocols
- Internal compliance review structure
- Oversight governance model

4. Certification & Disciplinary Systems

- Internal enforcement procedures
- Suspension/decertification workflow integration

- Registry permission gating
- Reporting automation design

5. Pricing and Administrative Controls

- Fee architecture
- QA cost allocation methodology
- Internal cost modeling structure

Collectively, these components constitute GSR's proprietary ECC-Provider infrastructure.

III. BASIS FOR CONFIDENTIAL TREATMENT

The ECC-Provider Application qualifies as confidential business information and trade secret material under:

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

A. Trade Secret Characteristics

The document:

- Derives independent economic value from not being publicly known
- Contains proprietary system architecture
- Reflects significant investment in system design and regulatory integration
- Is not publicly distributed
- Is maintained internally as confidential

The registry logic, QA structure, enforcement mechanisms, and technical architecture are core competitive assets.

B. Competitive Harm

Public disclosure would:

- Allow competitors to replicate GSR's registry architecture
- Reveal enforcement and QA thresholds

- Expose internal system gating mechanisms
- Enable duplication of workflow control logic
- Disclose security architecture and hosting structure
- Reveal disaster recovery design and internal compliance controls

This would significantly undermine GSR's competitive position in the ECC-Provider marketplace.

IV. REDACTION IS NOT FEASIBLE

Redaction is not practicable because:

- Proprietary infrastructure details are embedded throughout the document
- Removal of technical and operational content would render the application incomplete
- The Commission requires full system transparency for review
- Selective redaction would eliminate critical evaluative content

Confidential designation of the full document is therefore necessary.

V. PUBLIC INTEREST BALANCING

Confidential designation will:

- Protect proprietary business systems
- Preserve registry security integrity
- Protect QA and enforcement methodologies
- Maintain examination and workflow defensibility

The Commission will retain full access for review and oversight.

VI. DURATION OF CONFIDENTIALITY REQUESTED



GSR respectfully requests confidential designation for the duration of the **2025–2028 Triennial Code Cycle**, consistent with prior Commission practice for internal operational documents submitted by ECC/HERS Providers.

VII. LIMITATION OF ACCESS

Access to confidential materials should be limited to:

- Commission staff assigned to review
- Individuals authorized under Title 20 CCR §2505
- GSR personnel

Public disclosure is not authorized.

VIII. CERTIFICATION

I certify under penalty of perjury under the laws of the State of California that:

- The information identified above is true and correct;
- The ECC-Provider Application contains confidential trade secret information;
- It is not publicly available;
- It is maintained as confidential by GSR;
- Public disclosure would cause substantial competitive harm.

Executed on: 02/19/2026

Jonathan Johnson
Chief Executive Officer
National Energy Testing Institute, Inc.
DBA Golden State Registry

A handwritten signature in black ink, appearing to read "J. Johnson".