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Filer:	Jonathan Johnson
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ECC Application – R1

Scope of Registry

Public Document

Docket 25-BSTD-01 — 2025 Energy Code Compliance Provider Applications

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1. Introduction

Golden State Registry (“GSR”), formally National Energy Testing Institute, Inc. (DBA Golden State Registry), hereby submits this Scope Statement in support of its 2025 Energy Code Compliance (“ECC”) Provider and Registry application. This application seeks approval for a limited scope of services — prescriptive compliance of single-family residential space conditioning system alterations — consistent with the California Energy Commission’s (“CEC”) explicit provisions for scope definition and limitation in the ECC Provider Application Guidance.

The ECC Provider Application Guidance states that:

“The provider application must include a statement of scope that specifies the services the applicant intends to provide, and the applicant should define its rater certifications specific to building types and measures to be verified.” [ECC Provider Application Guidance, p. 20]

The Guidance further confirms that:

“If the scope of the provider application limits provisions to certain building types or compliance methods, then some requirements could be considered not applicable to the scope of the application.” [ECC Provider Application Guidance, p. 21]

GSR’s proposed limited scope is squarely aligned with this language — clearly defined, limited to a single building type and specific compliance measures, and therefore qualifying for the streamlined applicability provisions outlined by the CEC.

Precedent for Limited Scope Approvals. The concept of limited scope approval is well established in prior code cycles under the CEC’s Home Energy Rating System (“HERS”) Provider and Data Registry framework. Multiple HERS Providers have been approved with defined and limited scopes — tailored to specific building types, compliance methods, or measure categories — recognizing that specialization can enhance quality control, operational readiness, and service delivery.

This precedent was reaffirmed in CEC Order No: 25-0508-04, adopted at the May 8, 2025 Business Meeting, which certified GSR as a HERS Provider and approved its Residential Data Registry under the 2022 Energy Code. In that order, the Commission explicitly approved a scope: “limited to prescriptive compliance of single-family residential space conditioning system alterations under the 2022 Energy Code.” [CEC Order No: 25-0508-04, Conclusion and Order]

While the 2022 HERS certification does not constitute automatic ECC Provider approval — and GSR acknowledges that ECC program approval requires meeting 2025-specific regulatory and technical standards — the recent CEC findings establish a strong factual basis for concluding that GSR is programmatically ready to deliver the same scope under the ECC framework.

Strategic and Industry Benefits. Approving GSR’s ECC application for this limited scope will: Maintain Industry Continuity — GSR can “hit the ground running” in providing registry and compliance services for prescriptive compliance of single-family residential space conditioning system alterations without delay, ensuring minimal disruption to contractors, raters, and permitting authorities; Support Quality and Compliance — Focused scope allows for intensive quality assurance and reduced operational risk at launch; and Enable Phased Expansion — While servicing the industry under the current scope, GSR will continue its software and operational development for additional ECC pathways, following the CEC’s formal amendment process for scope expansion.

2. Scope of Current Application

For the purposes of this application, GSR seeks ECC Provider and Registry approval with a defined scope of prescriptive compliance of single-family residential space conditioning system alterations. This is the same scope recently approved by the CEC under the 2022 Energy Code in its May 8, 2025 order, and is intentionally limited to the prescriptive pathway because our registry does not currently support the Performance Pathway provisions of the code.

2.1 Regulatory Basis for Scope Definition

The ECC Provider Application Guidance (p. 20) explicitly permits applicants to define their scope according to building type and compliance method, and states that “the applicant should define its rater certifications specific to building types and measures to be verified.” As noted on p. 21 of the Guidance, “If the scope of the provider application limits provisions to certain building types or compliance methods, then some requirements could be considered not applicable to the scope of the application.” In alignment with this provision, requirements related solely to the Performance Pathway will be marked “N/A” in our compliance checklist, and all evidentiary materials will be tailored to this prescriptive scope.

2.2 Operational and Programmatic Readiness

Our existing registry, workflows, and data validation systems are fully capable of supporting prescriptive compliance of single-family residential space conditioning system alterations. This includes all associated compliance documents and data transfer protocols as required under Title 24, Part 1, and the 2025 Reference Appendices.

2.3 Maintain Industry Continuity

This targeted scope enables GSR to “hit the ground running” in providing registry and compliance services for prescriptive compliance of single-family residential space conditioning system alterations without delay, ensuring minimal disruption to contractors, raters, and permitting authorities.

2.4 ECC Document Pathways Covered

Under this scope, GSR’s registry will support the following document categories: CF1R — Prescriptive Certificates of Compliance for HVAC alterations; CF2R — Certificates of Installation for HVAC systems, ducts, fans, refrigerant charge verification, airflow rate measurement, and related prescriptive measures; and CF3R — Certificates of Verification for all measures that require independent verification by an ECC Rater under the prescriptive pathway.

Document Number	Document Type	Document Description
CF1R-ALT-02-E	Prescriptive Certificate of Compliance	HVAC Alterations
CF2R-MCH-01b-E	Certificate of Installation	HVAC Systems, Ducts and Fans for Prescriptive Alterations
CF2R-MCH-20-H	Certificate of Installation	Duct Leakage Diagnostic Test
CF2R-MCH-22-H	Certificate of Installation	Space Conditioning System Fan Efficacy
CF2R-MCH-23-H	Certificate of Installation	Space Conditioning System Airflow Rate
CF2R-MCH-25-H	Certificate of Installation	Refrigerant Charge Verification
CF2R-MCH-28-H	Certificate of Installation	Return Duct Design and Air Filter Device Sizing According to Tables 150 B or C
CF3R-MCH-20-H	Certificate of Installation	Duct Leakage Diagnostic Test
CF3R-MCH-22-H	Certificate of Installation	Space Conditioning System Fan Efficacy
CF3R-MCH-23-H	Certificate of Installation	Space Conditioning System Airflow Rate
CF3R-MCH-25-H	Certificate of Installation	Refrigerant Charge Verification
CF3R-MCH-28-H	Certificate of Installation	Return Duct Design and Air Filter Device Sizing According to Tables 150 B or C

3. Capability & Readiness

Golden State Registry (GSR) has already demonstrated the ability to operate as a CEC-approved registry for the prescriptive compliance of single-family residential space conditioning system alterations through its recent certification under the 2022 Energy Code. While this prior approval does not automatically confer ECC Provider status, it confirms that GSR’s operational, technical,

and compliance infrastructure meets the standards required to deliver high-quality registry services in this scope. With the transition to the ECC 2025 program, GSR has committed to implementing all required updates to its systems and processes to ensure full compliance with new regulatory and technical specifications.

3.1 Technical Systems

- Form Integration and Validation — All CF1R, CF2R, and CF3R forms in our scope are integrated into the registry with built-in validation against ECC 2025 data fields and calculation methodologies.
- Automated Data Compliance Checks — The system applies logic to flag inconsistencies, incomplete fields, and results that fall outside ECC compliance thresholds, ensuring that only compliant documents are finalized.
- Secure Data Transmission and Storage — In accordance with CEC data protection requirements, all sensitive information is encrypted at rest and in transit, with multi-factor authentication for registry access.
- Audit Logging and Traceability — Each document action is logged for compliance auditing, with timestamps, user identifiers, and version tracking.

3.2 Operational Processes

- Document Intake and Review — Submitted documents are processed through automated checks followed by targeted manual review for flagged items.
- User Support Infrastructure — GSR maintains a dedicated helpdesk and technical support channel for raters, contractors, and building officials, with escalation paths for compliance-related queries.
- Stakeholder Coordination — Processes are in place to coordinate with local jurisdictions, ensuring that ECC compliance documents are recognized and accepted by permitting authorities.
- Regulatory Update Integration — GSR’s operational SOPs include a defined process for integrating future regulatory updates into registry workflows within 60 days of CEC notice.

3.3 Quality Assurance Oversight

- Routine QA Audits — Scheduled reviews of a statistically valid sample of registry entries to verify accuracy and completeness.
- Corrective Action Protocols — Defined steps for addressing non-compliant entries, including user notification, training intervention, and follow-up audits.
- Performance Monitoring — Key performance indicators (KPIs) such as error rates, processing time, and user satisfaction are tracked quarterly and reported internally.

- Feedback Loop to Training — Issues identified in QA audits are directly incorporated into targeted training sessions for raters and registry users, creating a continuous improvement cycle.

4. Future Scope Expansion

While this application seeks approval solely for the prescriptive compliance of single-family residential space conditioning system alterations, GSR has an active development plan to expand its scope in future amendment cycles, consistent with CEC processes for scope modification.

Planned Approach

Our roadmap for expansion is guided by three principles: (1) Regulatory Alignment — new pathways will only be introduced once all relevant ECC regulations, Reference Appendices, and Implementation Manuals are fully analyzed and integrated into training and software; (2) Technical Readiness — all system modules for new pathways will undergo controlled beta testing by GSR staff, analysts, and other qualified personnel, along with selected raters and contractors, before submission to the CEC for approval; and (3) Operational Continuity — expansion will be staged to ensure uninterrupted service for the existing prescriptive pathway scope.

Potential Expansion Targets

- Additional HVAC-related prescriptive measures beyond the current alteration pathways;
- New construction compliance pathways once the technical requirements are fully integrated;
- Support for multi-family residential prescriptive measures under ECC.

By taking a phased approach, GSR avoids the operational and compliance risks associated with attempting to implement multiple new pathways simultaneously, ensuring the CEC can evaluate each expansion on its own merits.

5. Training Alignment

Training is central to the successful implementation of the prescriptive compliance of single-family residential space conditioning system alterations scope. GSR's training program has been updated to reflect ECC 2025 regulatory requirements while preserving the proven structure that supported our 2022 scope approval.

5.1 Curriculum Design

Our curriculum is designed to align with CEC's training standards for ECC raters and registry users, and is organized around the specific compliance documents and diagnostic procedures in our approved scope. Each training unit includes: (a) the regulatory basis for each measure and

form; (b) step-by-step field and documentation procedures; and (c) common error scenarios and correction processes.

5.2 Delivery Methods

GSR delivers training through a blended learning model, including: online modules that cover regulatory background and data entry procedures; live webinars for interactive Q&A and scenario walkthroughs; and in-person labs for hands-on training in diagnostic testing and field verification procedures.

5.3 Continuous Improvement

Our training program is closely connected to feedback from the field and our quality assurance program. QA findings are addressed through targeted training sessions that focus on the specific issues observed in practice. Regulatory updates from the CEC are incorporated into training by adjusting emphasis, delivery methods, and field guidance so that participants remain current and capable in their roles. Participant feedback, industry trends, and evolving best practices are routinely analyzed to refine both the focus and approach of our training, ensuring it remains practical, relevant, and responsive to real-world needs.

6. Conclusion

Golden State Registry appreciates the opportunity to submit this Scope Statement as part of our application for approval as an ECC Provider and Registry. By clearly defining our scope as prescriptive compliance of single-family residential space conditioning system alterations, we have aligned our application with both the explicit provisions of the ECC Provider Application Guidance and established CEC precedent for limited-scope approvals. This targeted scope allows GSR to leverage its proven operational, technical, and training capabilities to maintain continuity of service for the industry, support contractors, raters, and permitting authorities without interruption, and ensure immediate compliance-readiness under ECC 2025. It also provides a stable foundation from which to develop and launch additional pathways in a controlled, compliant, and high-quality manner.

We respectfully submit that our demonstrated track record, recent certification under the 2022 Energy Code for this identical scope, and readiness to meet ECC 2025 requirements make GSR a strong candidate for approval in this category. We look forward to continuing our collaboration with the CEC and our industry partners to advance energy code compliance, maintain rigorous quality standards, and support California's energy efficiency goals.

References

- ECC Provider Application Guidance, p. 20.
- ECC Provider Application Guidance, p. 21.
- CEC Order No: 25-0508-04, May 8, 2025, Conclusion and Order.