

**DOCKETED**

<b>Docket Number:</b>	25-BSTD-01
<b>Project Title:</b>	2025 Energy Code Compliance Provider Applications
<b>TN #:</b>	268891
<b>Document Title:</b>	Confidentiality Application T1 and R2
<b>Description:</b>	N/A
<b>Filer:</b>	Jonathan Johnson
<b>Organization:</b>	Golden State Registry
<b>Submitter Role:</b>	Applicant
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# APPLICATION FOR CONFIDENTIAL DESIGNATION

Title 20 CCR §2505 et seq.  
Public Document

Proceeding Name: 2025 Energy Code Compliance Provider Applications  
Docket Number: 25-BSTD-01  
Date: 3/2/2026

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## 1. Contact Information (20 CCR 1208.1)

Applicant Name: Golden State Registry (DBA of National Energy Testing Institute, Inc.)  
Phone Number: 805-201-9047  
E-mail: helpdesk@gsregistry.org  
Proceeding Name: 2025 Energy Code Compliance Provider Applications  
Docket Number: 25-BSTD-01

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## 2. Title, Date, and Description of the Records

(20 CCR 1208.1)

### Record 1

Title: Exhibit T1 — ECC Rater Training Checklist (2025 Code)  
Date: Updated February 20, 2026  
Length: 12 pages

#### Description:

A detailed compliance cross-reference matrix mapping Title 24, Part 6 §10-103.3(d)(1), RA1–RA4, NA1–NA2, and related ECC-Provider requirements to specific GSR training modules, exhibits, examination banks, QA controls, and governance documents.

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## Record 2

Title: Exhibit R2 — Residential Data Registry Application Compliance Cross-Reference Checklist (2025 Code)

Date: Updated February 20, 2026

Length: 21 pages

### Description:

A detailed registry compliance matrix mapping Title 24, Part 1 §10-109 and JA7.4–JA7.7 requirements to specific sections of GSR’s registry application, software logic, digital signature implementation, validation rules, retention controls, and CEC acceptance testing verification.

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## 3. Specific Portions for Which Confidentiality Is Requested

(20 CCR 2505(a)(1)(B))

Confidential designation is requested for the **entirety of both documents**.

These documents:

- Reveal precise internal compliance architecture
- Identify exact module locations and governance structures
- Cross-reference proprietary exhibits previously submitted under confidentiality
- Disclose internal validation logic, enforcement controls, signature sequencing, QA escalation paths, and workflow gating logic
- Reveal internal roadmap structure and implementation sequencing

Because proprietary and security-sensitive material is embedded throughout both matrices, redaction of isolated sections would not meaningfully protect the confidential content.

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## 4. Length of Time Requested

(20 CCR 2505(a)(1)(C))

**Requested Duration:** Three (3) years from the date of filing.

**Justification for Duration:**

The checklists contain internal regulatory cross-reference architecture, proprietary compliance structuring methodology, implementation sequencing, and internal system mapping logic specific to the 2025 code cycle.

The competitive sensitivity of these materials is greatest during the active approval and early operational period of the 2025 ECC code cycle. A three-year confidentiality period appropriately protects GSR's proprietary implementation framework while aligning with the active lifecycle of the current registry approval.

At the conclusion of the three-year period, the competitive sensitivity of the structured mapping logic will be materially reduced due to public operation, code cycle transition, and potential regulatory updates.

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## 5. Legal Basis Under California Public Records Act

(20 CCR 2505(a)(1)(D))

Confidential treatment is warranted under:

- Government Code §7927.705 (Trade Secrets)
- Evidence Code §1060 (Trade Secret Privilege)
- Government Code §7922.000 (Public Interest Balancing Test)

The checklists contain trade secret information and confidential business methodologies. Disclosure would reveal proprietary system design, internal controls, workflow logic, and implementation architecture.

The public interest in disclosure is minimal because the Commission retains full access for review and oversight.

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## 6. Trade Secret / Competitive Harm Factors

(20 CCR 2505(a)(1)(D))

### (a) Specific Nature of the Competitive Advantage

The documents reveal:

- Internal regulatory mapping strategy

- Compliance architecture methodology
- Training structuring logic
- Registry gating controls
- Signature sequencing enforcement
- Validation schema integration
- QA and discipline cross-reference integration
- Acceptance testing verification structure

This represents substantial internal intellectual capital and implementation effort.

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### **(b) How the Advantage Would Be Lost**

Public disclosure would:

- Allow competitors to replicate GSR's compliance architecture
  - Reveal internal document mapping strategies
  - Expose structural sequencing of registry implementation
  - Disclose validation and enforcement logic
  - Enable shortcut duplication of proprietary training and registry alignment frameworks
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### **(c) Value of the Information**

The value lies in:

- Years of structured regulatory alignment work
  - System architecture design
  - Cross-disciplinary integration between training, QA, registry, and signature infrastructure
  - Competitive differentiation in ECC-Provider marketplace
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### **(d) Ease or Difficulty of Legitimate Acquisition**

The information could not be independently reconstructed without:

- Significant technical system design effort
- Internal access to registry architecture
- Full knowledge of QA logic and compliance gating
- Examination integration methodology

Duplication would otherwise require substantial time, cost, and internal development.

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## 7. Aggregation or Masking

(20 CCR 2505(a)(1)(E))

Aggregation is not feasible.

Redaction would not protect the proprietary value because:

- The competitive advantage lies in the structured mapping itself
- Even high-level references reveal architectural design logic
- Removal of internal mapping references would render the documents meaningless

Accordingly, full confidential designation is required.

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## 8. Confidential Handling and Disclosure History

(20 CCR 2505(a)(1)(F))

The documents:

- Are maintained in restricted-access internal systems
- Are accessible only to executive leadership and authorized compliance personnel
- Have not been publicly distributed
- Are provided solely to the Commission for regulatory review

They are not publicly available.

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## 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.”

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## 10. Entity Type and Authorization

(20 CCR 2505(a)(1)(G))

Golden State Registry is a California business entity operating as a DBA of National Energy Testing Institute, Inc. The undersigned is authorized to submit this application and certification on behalf of the entity.

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

Signature:  \_\_\_\_\_  
Date: 3/2/2026