

DOCKETED

Docket Number:	25-BSTD-01
Project Title:	2025 Energy Code Compliance Provider Applications
TN #:	268892
Document Title:	Confidentiality Application Exhibit T Updated
Description:	N/A
Filer:	Jonathan Johnson
Organization:	Golden State Registry
Submitter Role:	Applicant
Submission Date:	3/2/2026 10:00:05 AM
Docketed Date:	3/2/2026



APPLICATION FOR CONFIDENTIAL DESIGNATION (CEC-13)

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

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

2. Title, Date, and Description of the Record

(20 CCR 1208.1)

Title: Exhibit T — GSR ECC Rater Training Program (2025 Code Revision)
Date: 3/2/2026
Length: 294 Pages

Description:

A comprehensive ECC-Rater training curriculum and instructional manual addressing Title 24, Part 6 §10-103.3(d)(1), RA1–RA4, NA1–NA2, JA7, QA obligations, examination controls, field verification procedures, compliance documentation workflows, and registry interaction protocols.

3. Specific Portions for Which Confidentiality Is Requested

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

Confidential designation is requested for the entire document.

The training manual includes:

- Structured instructional methodology
- Proprietary curriculum sequencing
- Internal compliance interpretation frameworks
- Field verification procedural explanations
- QA enforcement integration logic
- Examination alignment references
- Instructional examples and applied narrative scenarios
- Cross-references to confidential exhibits
- Proprietary educational delivery structure

Proprietary information is embedded throughout the document; selective redaction would not meaningfully protect the intellectual property.

4. Length of Time Requested

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

Requested Duration: Six (6) years from the date of filing.

Justification for Duration:

The GSR ECC Rater Training Program (2025 Code Revision) constitutes proprietary instructional architecture, regulatory interpretation methodology, curriculum sequencing, QA integration logic, and examination alignment structure specific to the 2025 Energy Code Cycle.

The competitive sensitivity of this material extends beyond the immediate approval phase because:

- The curriculum structure and pedagogical sequencing remain viable across multiple code cycles.
- The regulatory interpretation framework and structured mapping of Title 24 requirements represent substantial internal intellectual development.

- The integration between training, QA governance, and registry functionality reflects long-term system design.
- Disclosure during the active lifecycle of the 2025 Code Cycle would allow competitors to replicate the instructional architecture without equivalent investment.

A six-year confidentiality period appropriately protects the proprietary value of the curriculum across two triennial code cycles while remaining reasonably tied to the regulatory lifecycle of the program.

5. Legal Basis Under CPRA

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

Confidential treatment is warranted under:

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

The manual contains trade secrets and proprietary instructional methodologies developed through substantial investment and internal regulatory structuring.

6. Trade Secret / Competitive Harm Factors

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

(a) Nature of Competitive Advantage

The manual reflects:

- Proprietary instructional architecture
 - Regulatory interpretation methodology
 - Integrated QA and discipline structuring
 - Structured mapping of code requirements to training modules
 - Testing alignment and examination integration framework
-

(b) How Advantage Would Be Lost

Disclosure would:

- Allow competitors to replicate GSR's curriculum structure
 - Reveal instructional sequencing methodology
 - Expose regulatory interpretation structuring
 - Enable duplication of training architecture without equivalent development investment
-

(c) Value of the Information

The value derives from:

- Years of curriculum development
 - Code-cycle specific integration
 - Integrated registry alignment
 - QA system alignment
 - Examination structure integration
-

(d) Ease or Difficulty of Legitimate Acquisition

The content could not be legitimately acquired without:

- Independent regulatory analysis
- Curriculum development effort
- System integration work
- Practical testing validation development

Duplication would require significant cost and time.

7. Aggregation or Masking

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

Redaction is not feasible because proprietary content permeates the entire document. Aggregation would eliminate the instructional content and render the document meaningless.

8. Confidential Handling and Disclosure History

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

The training manual:

- Is maintained in restricted internal systems
- Is distributed only to authorized instructional personnel and regulatory reviewers
- Is not publicly distributed in full form
- Is provided to the Commission solely for regulatory review

9. Certification

“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

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.

Jonathan Johnson
Chief Executive Officer
Golden State Registry

Signature: 
Date: 3/2/2026