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: 03/02/2026

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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 Record

(20 CCR 1208.1)

Title: Exhibit T7 — GSR ECC Software Training Manual (2025 Code)
Length: 164 pages

Date: 03/02/2026 (2025 Code Revision)

Description:

A comprehensive "Help-Style" operational user manual describing the functionality, workflows, validation controls, document sequencing logic, electronic signature enforcement, project lifecycle management, QA integration, and consumer transparency features of the Golden State Registry ECC software platform.

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3. Specific Portions for Which Confidentiality Is Requested

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

Confidential designation is requested for the **entire document**.

The manual contains proprietary system design elements including:

- User role permissions architecture
- Secure login and credential enforcement controls
- CAPTCHA and authentication measures
- Validation gates blocking incomplete submissions
- Signature sequencing and declaration enforcement
- Registration numbering logic
- Revision increment and parent/child relationship logic
- Automated calculation algorithms (airflow, duct leakage, refrigerant compliance)
- Failure detection triggers and retest automation
- QA flagging workflow integration
- Project Status Report (PSR) generation and QR validation
- Consumer Information Form (CIF) automation
- Field Verification & Diagnostic Testing Service Site Report generation logic
- Transparent pricing integration and enforcement

Because proprietary logic is embedded throughout the workflow descriptions and screenshots, selective redaction would not meaningfully protect the confidential material.

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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 Software Training Manual discloses proprietary registry architecture, workflow gating logic, system validation sequencing, digital signature enforcement, and QA integration methods tied to the 2025 Code Cycle registry implementation.

The competitive sensitivity of this documentation extends across multiple code cycles because:

- The software architecture and workflow logic remain operational beyond a single cycle.

- Validation and signature enforcement mechanisms represent substantial internal development.
- Disclosure would enable reverse engineering of registry structure.
- The manual reveals structured sequencing of regulatory compliance controls.

A six-year confidentiality period appropriately protects the proprietary value of the registry implementation across two triennial code cycles.

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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 Test)

The manual contains proprietary software architecture and internal compliance enforcement methodology not publicly available.

Public disclosure would provide competitors with detailed insight into system validation logic and internal compliance automation.

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6. Trade Secret / Competitive Harm Factors

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

(a) Nature of Competitive Advantage

The manual reflects:

- Proprietary registry workflow architecture
- Validation gating logic preventing non-compliant document registration
- Digital signature sequencing enforcement
- Automated compliance calculation integration
- Retest/failure handling automation
- QA integration structure
- Consumer transparency automation

(b) How Advantage Would Be Lost

Disclosure would:

- Allow competitors to replicate registry architecture
- Reveal calculation and enforcement sequencing
- Expose internal compliance automation logic
- Facilitate reverse engineering of validation workflows

(c) Value of the Information

The value derives from:

- Substantial internal software development investment
- Integration of regulatory requirements into system logic
- Multi-stage validation and signature enforcement automation
- Consumer reporting integration under 2025 code updates

(d) Ease or Difficulty of Legitimate Acquisition

The information cannot be obtained through public sources.
Reconstruction would require:

- Independent software development
- Regulatory cross-mapping
- QA and validation logic design
- Acceptance testing iteration

7. Aggregation or Masking

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

Aggregation is not feasible.

Redaction would eliminate the value of the document because proprietary workflow logic is embedded throughout screenshots and narrative explanations.

Full confidential designation is required.

8. Confidential Handling and Disclosure History

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

The Software Training Manual:

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

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: 03/02/2026 _____