

**DOCKETED**

<b>Docket Number:</b>	25-BSTD-01
<b>Project Title:</b>	2025 Energy Code Compliance Provider Applications
<b>TN #:</b>	268894
<b>Document Title:</b>	Confidentiality Application Exhibits A01 and A02 2025
<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: 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](mailto: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 A-02 — Consumer Information Form  
Length: 4 pages

Date: 03/02/2026

#### Description:

Consumer-facing disclosure document required under Title 24, Part 1 §10-103.3(b)1A(vii), explaining the role of the ECC-Rater, ECC-Rater Company, ECC-Provider, and required verification procedures, including registry integration and complaint reporting structure.

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## Record 2

Title: Exhibit A-01 — Field Verification & Diagnostic Testing (FV&DT) Service Site Report Template

Length: 9 pages

Date: 03/02/2026

### Description:

Consumer-facing service site report template required under Title 24, Part 1 §10-103.3(b)1A(vi), documenting field verification tasks performed, registered compliance document identifiers, registry auto-population logic, pricing transparency structure, and ECC-Rater certification attestations.

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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.

While these forms are consumer-facing, the submitted templates reflect proprietary implementation and structural elements, including:

- Structured integration with GSR registry auto-population logic
- Registry registration numbering display format
- PSR alignment structure
- Auto-generated document linking
- Pricing transparency formatting logic
- Compliance sequencing architecture
- Required workflow confirmation structure within the registry

These templates are not generic statutory reproductions; they reflect GSR's proprietary formatting, structural sequencing, and implementation methodology within the registry system.

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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 templates reflect GSR's proprietary implementation of newly required 2025 Code Cycle consumer transparency documents. Competitive sensitivity is highest during the active early lifecycle of the 2025 Code Cycle when registry providers are implementing similar compliance structures.

A three-year confidentiality period appropriately protects the proprietary formatting and structural integration methodology during the primary operational phase of the code cycle.

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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)

Although these documents fulfill regulatory requirements, the submitted templates contain proprietary formatting, structural implementation logic, and registry integration architecture not publicly required to be disclosed.

Public disclosure would provide competitors with structured implementation insight beyond the minimum regulatory requirement.

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## **6. Trade Secret / Competitive Harm Factors**

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

### **(a) Nature of Competitive Advantage**

The advantage lies in:

- Structured integration of consumer forms within registry automation
- Registry-driven auto-population logic
- Pricing display architecture
- Structured compliance confirmation sequencing

- Harmonized formatting between CF1R/CF2R/CF3R and consumer reports
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### **(b) How the Advantage Would Be Lost**

Disclosure would:

- Allow competitors to replicate GSR's structured consumer reporting design
  - Reveal implementation sequencing tied to registry logic
  - Enable duplication of proprietary formatting and integration framework
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### **(c) Value of the Information**

The value derives from:

- Regulatory cross-mapping work
  - Registry integration engineering
  - Consumer transparency implementation design
  - Structured formatting that aligns with GSR system outputs
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### **(d) Ease or Difficulty of Legitimate Acquisition**

While the regulatory requirement itself is public, the structured implementation and integration methodology within the GSR registry is not publicly available and cannot be reconstructed without independent system development effort.

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## **7. Aggregation or Masking**

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

Redaction would not protect the proprietary structural formatting and integration logic embedded throughout the documents. Full confidential designation is requested.

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## 8. Confidential Handling and Disclosure History

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

These templates:

- Are maintained within restricted internal systems
  - Are distributed only as part of registry-generated outputs
  - Are not publicly posted as standalone templates
  - Are provided to the Commission solely for regulatory approval
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## 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.”

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## 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