

DOCKETED

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Description:	N/A
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APPLICATION FOR CONFIDENTIAL DESIGNATION

Title 20 CCR §2505
Public Document

Proceeding Name: 2025 Energy Code Compliance Provider Applications
Docket Number: 25-BSTD-01
Date: 03/02/2026

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 Information

(20 CCR 1208.1)

Title: ECC Application – Q1
Golden State Registry Quality Assurance Program
Date: November 2025
Length: 72 pages

Description:

A comprehensive Quality Assurance (QA) Program adopted pursuant to Title 24, Part 1 §10-103.3(d), including organizational structure, onsite and desk audit methodology, variance analysis protocols, conflicted data detection controls, complaint tracking system, discipline procedures for ECC-Raters and ECC-Rater Companies, QA database architecture, and implementation forms (QAF-1 through QAF-6).

3. Specific Portions for Which Confidentiality Is Requested

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

Confidential designation is requested for the entire document.

The QA Program contains proprietary operational information including:

- Detailed audit variance thresholds
- 20-project comparison methodology
- Internal QA database structure
- Automated escalation logic
- Enforcement sequencing
- Progressive discipline implementation pathways
- Remedy procedures tied to flawed FV&DT
- Internal reporting mechanisms
- Complaint investigation protocols
- Conflicted data isolation controls
- Structured QA staffing and independence framework

These elements reveal GSR's internal enforcement architecture and measurable compliance control mechanisms.

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 Golden State Registry Quality Assurance Program (Exhibit Q1) contains proprietary internal audit methodology, enforcement sequencing, variance analysis structure, complaint investigation protocols, and discipline implementation architecture specific to the 2025 Energy Code Compliance Program.

The competitive sensitivity of these materials is highest during the active operational phase of the 2025 Code Cycle when registry providers are implementing and refining oversight systems.

A three-year confidentiality period appropriately protects GSR’s proprietary QA enforcement framework during the primary operational lifecycle of the current code cycle while remaining proportionate to the regulatory timeline.

5. Legal Basis for Confidential Treatment

(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 QA Program contains trade secret operational methodologies and internal enforcement mechanisms that derive independent economic value from not being publicly disclosed.

Public disclosure would compromise competitive advantage and potentially weaken enforcement integrity.

6. Trade Secret / Competitive Harm Factors

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

(a) Specific Nature of Competitive Advantage

The QA Program provides:

- Structured internal audit methodology
- Defined variance tolerances
- Enforcement trigger thresholds
- Multi-project comparative analysis structure
- Automated discipline progression framework
- Integrated QA database architecture

These constitute core competitive governance infrastructure.

(b) How the Advantage Would Be Lost

Disclosure would:

- Allow competitors to mirror enforcement thresholds
 - Replicate discipline sequencing logic
 - Duplicate QA database structure
 - Reverse engineer oversight methodology
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(c) Value of the Information

The value derives from:

- Regulatory cross-analysis
 - Development of measurable audit controls
 - Implementation of independent QA division
 - Structured enforcement architecture
 - Integration with registry and training systems
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(d) Ease or Difficulty of Legitimate Acquisition

The QA framework cannot be obtained through public sources and would require significant independent regulatory design, system integration, and enforcement modeling to reproduce.

7. Aggregation or Masking

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

Redaction is not feasible because proprietary operational controls and enforcement thresholds are embedded throughout the document. Aggregation would eliminate substantive content.

Full confidential designation is requested.

8. Confidential Handling and Disclosure History

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

The QA Program:

- Is maintained in restricted internal systems
 - Is accessible only to authorized personnel
 - Is not publicly distributed
 - Is 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.”

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