

**DOCKETED**

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<b>Filer:</b>	Travis Fischer
<b>Organization:</b>	Travis Fischer
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## PUBLIC COMMENT — Docket 25-BSTD-01 Re: Golden State Registry ECC Provider Application

As a working energy consultant and HERS Rater with years of field experience in the HERS program and direct familiarity with the regulatory demands of Title 24 compliance, I write to formally express concern about the quality, authenticity, and substantive adequacy of the documents submitted by Golden State Registry (GSR) in support of its 2025 ECC Provider and Residential Data Registry Applications.

Having reviewed the publicly docketed materials, including Exhibit R1 (Scope of Registry), Exhibit R3 (Proof of Self-Testing), and the Public Summaries for Exhibits Q1, T, T7, A01, A02, T1, and R2, I am troubled by a consistent set of characteristics that, taken together, strongly suggest these documents were drafted primarily using a large language model (AI text generator) rather than by subject matter experts with genuine operational knowledge of the ECC program.

### **Generic, Templated Language That Lacks Technical Specificity**

Throughout the submitted documents, substantive regulatory compliance claims are expressed in vague, buzzword-heavy language that reads more like marketing copy than technical documentation. The R1 Scope of Registry, for instance, asserts that GSR's training program employs a "blended learning model" and is guided by principles of "integrity, transparency, and accountability" -- phrases that are characteristic of AI-generated boilerplate with no meaning in the context of a regulatory application. Meanwhile, the document's entire References section consists of exactly three citations: two pointing generically to "ECC Provider Application Guidance, p. 20" and "p. 21," and one to a CEC order. For a nine-page document making sweeping claims about regulatory conformance, curriculum design, technical system architecture, and QA oversight, this is not a reference list; it is a placeholder that was never filled in.

### **Evidence of Incomplete AI Drafting**

Perhaps most damning is that the Confidentiality Application for Exhibits F1 through F9, filed in GSR's own name and certified under penalty of perjury -- contains an unremediated placeholder: "Date: [Insert Filing Date]." This was submitted to the California Energy Commission in a formal regulatory proceeding. A professional organization with genuine capacity to administer an ECC program does not submit documents to a state agency with draft placeholders still intact. This is exactly the kind of error that occurs when someone pastes AI-generated output directly into a filing without meaningful review.

### **Date and Versioning Inconsistencies**

Multiple documents bear "© 2025 Golden State Registry" copyright footers and internal version stamps of "\_v1\_2025-11-25" (e.g., the F1-F9 Confidentiality Request footer) on filings submitted in February and March 2026. This suggests that these documents were generated, minimally

adapted, and resubmitted without substantive revision, consistent with the behavior of someone using AI to produce draft templates and submitting them with cosmetic modifications rather than genuine operational development.

### **Circular Compliance Assertions**

The R3 Proof of Self-Testing document, rather than providing documentary evidence of actual testing, repeatedly asserts that testing was completed through formulaic language. Section 4.7, for example, claims confirmation of "end-to-end operational integrity" by listing a flowchart of workflow steps separated by arrows, with no actual test results, logs, screenshots, or any verifiable evidence provided. Similarly, the QA Program Public Summary (Exhibit Q1) describes the QA program's structure in terms of what it "does" and "ensures" using the kind of parallel-constructed bullet-point lists that AI models produce by default, without a single concrete, falsifiable operational detail.

### **Structural Hallmarks of AI Document Generation**

The document structure across all GSR filings follows a near-identical pattern: numbered sections with three-part subsections (e.g., "3.1 Technical Systems / 3.2 Operational Processes / 3.3 Quality Assurance Oversight"), each beginning with a one-sentence topic statement followed by bulleted assertions. This organizational homogeneity, replicated across documents about training programs, registry architecture, consumer forms, and enforcement procedures, is consistent with a single AI model being prompted with different topics but producing structurally identical outputs.

### **The Substantive Problem**

The issue here is not merely stylistic. The ECC Provider program exists to protect California consumers and ensure that energy compliance is real, not a paperwork exercise. An ECC Provider that cannot produce operationally-grounded documentation raises serious questions about whether it can actually perform the oversight, training, and quality assurance that the program demands. If GSR cannot demonstrate that it understands the Title 24 compliance process deeply enough to write about it without an AI, how will it evaluate raters, conduct audits, and enforce corrective actions?

The Commission should require GSR to demonstrate operational capacity through verifiable, expert-authored documentation, in-person demonstrations, and staff interviews. Not polished AI prose that reads well but says nothing.

I suppose if the bar for becoming an ECC Provider in California is simply having access to ChatGPT, we should probably just skip the application process altogether and start issuing CF3R certificates to whoever has the best prompt engineering skills?

Sincerely,

Travis Fischer