

DOCKETED

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CONFIDENTIALITY REQUEST

Exhibit T4 — ECC Rater Company & Primary Rater Training Course

California Energy Commission
Docket Office
1516 Ninth Street, MS-4
Sacramento, California 95814

Submitted By:
Golden State Registry (GSR)
National Energy Testing Institute, Inc.

Re: Confidentiality Request for Exhibit T4
Docket Number: 25-BSTD-01
Authority: Title 20, California Code of Regulations, §§2501–2505

I. Introduction

Golden State Registry (“GSR”) respectfully requests that the California Energy Commission (“Commission”) grant confidential designation to Exhibit T4 submitted as part of its Energy Code Compliance (ECC) Provider Application under Docket 25-BSTD-01.

This request is made pursuant to Title 20, California Code of Regulations §§2501–2505, as well as Government Code §6254(k) and Evidence Code §1060, which authorize confidentiality protection for trade secrets and proprietary business information.

Exhibit T4 replaces a previously submitted version of the ECC Rater Company training material previously docketed as part of the GSR application materials. The updated version reflects refinements and updates to the training curriculum associated with the 2025 Energy Code cycle.

II. Material for Which Confidentiality Is Requested

GSR seeks confidential treatment for the following document:

Exhibit T4 — ECC Rater Company & Primary Rater Training Course (2025 Code Edition) Updated 03/14/2026

File Name: GSR_Exhibit_T4_ECC_Rater_Company_Primary_Training_2025(Updated)

This document contains the full training curriculum used by GSR to educate and certify ECC Rater Companies and Primary Raters participating in the Energy Code Compliance Program.

The document includes detailed and non-public information including:

- structured training curriculum and module sequencing
- instructional methodology and lesson planning
- regulatory interpretation guidance for program participants
- Quality Assurance oversight procedures
- disciplinary process explanations
- compliance documentation procedures
- operational interaction between Providers, Raters, Rater Companies, and enforcement agencies

These materials reflect proprietary instructional content and internal program administration methods developed by GSR for the operation of its ECC Provider program.

III. Basis for Confidentiality

The information contained in Exhibit T4 qualifies as protected confidential material and trade secret information under:

- Evidence Code §1060
- Government Code §6254(k)
- Title 20 CCR §2501(a)(1)(E)

The training course represents a proprietary instructional system developed by GSR to administer training and compliance education for ECC Rater Companies and Primary Raters.

Disclosure of this material would allow competing organizations to replicate GSR’s training curriculum, instructional framework, and program implementation methodology without incurring the significant time, cost, and expertise required to develop equivalent materials.

Because these materials derive economic value from not being publicly known and are maintained internally as confidential instructional resources, they meet the statutory definition of trade secrets.

IV. Why Redaction Is Not Feasible

Redaction is not feasible because the confidential information is embedded throughout the training course materials.

The document consists primarily of proprietary instructional content, module sequencing, and compliance program explanations that must be reviewed in full by Commission staff in order to evaluate the adequacy of GSR’s training program.

Removing these elements would eliminate the substantive content of the training and render the document incomplete for Commission review.

Confidential designation of the full exhibit is therefore appropriate.

V. Duration of Confidentiality Requested

GSR respectfully requests confidential treatment for **three (3) years**.

This duration reflects the proprietary nature of the training curriculum while acknowledging that elements of the ECC program may become publicly understood as the program is implemented.

VI. Access to Confidential Materials

Access should be limited to:

- Commission staff assigned to ECC Provider Application review
- individuals authorized by the Commission under nondisclosure provisions

