

DOCKETED

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Document Title:	Confidentiality Application ECC Application P Revised
Description:	N/A
Filer:	Jonathan Johnson
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APPLICATION FOR CONFIDENTIAL DESIGNATION (CEC-13)

Title 20, California Code of Regulations §§2501–2505

Proceeding Name: 2025 Energy Code Compliance Provider Applications

Docket Number: 25-BSTD-01

1. Contact Information (20 CCR §1208.1)

Applicant Name: Golden State Registry (DBA of National Energy Testing Institute, Inc.)

Phone Number: (805) 201-9047

Email: helpdesk@gsregistry.org

Proceeding Name: 2025 Energy Code Compliance Provider Applications

Docket Number: 25-BSTD-01

2. Title, Date, Description, and Number of Pages

Title of Record

ECC Application – P Provider Application (Revised and Updated June 2026)

Date

June 25, 2026

Length

136 pages.

Description

This document constitutes Golden State Registry's revised Energy Code Compliance (ECC) Provider Application submitted in support of its application for approval as an Energy Code Compliance Provider for the 2025 Building Energy Efficiency Standards. The application describes GSR's operational framework for administering the ECC Program, including its

governance structure, provider responsibilities, quality assurance program, ECC-Rater and ECC-Rater Company certification processes, training program, disciplinary procedures, reporting obligations, data management practices, and integration with the GSR Residential Data Registry. The application also incorporates and cross-references numerous supporting exhibits that collectively describe GSR's implementation of the 2025 Energy Code Compliance Program.

3. Specific Portion(s) Requested as Confidential (20 CCR §2505(a)(1)(B))

Golden State Registry requests confidential designation for the **entire document**.

The application contains proprietary operational methodologies, internal business processes, administrative procedures, workflow sequencing, quality assurance methodologies, registry implementation descriptions, compliance management systems, training integration, governance structures, and other confidential implementation information developed by GSR in connection with the design and operation of its Energy Code Compliance Provider and Residential Data Registry programs.

Because these proprietary methods and operational processes are integrated throughout the application, confidentiality cannot reasonably be limited to isolated sections without substantially impairing the document's usefulness for Commission review.

4. Length of Time Requested (20 CCR §2505(a)(1)(C))

Requested Duration

Six (6) years from the date of filing.

Justification

This document is a revised and updated version of the ECC Provider Application previously submitted to the California Energy Commission, for which confidential treatment was granted. The present request is based upon the contents of the revised application itself, which incorporates substantial revisions made during the Commission's review process and reflects the finalized implementation of GSR's operational framework for the 2025 Energy Code Compliance Program.

The application documents proprietary operational methods, quality assurance systems, training architecture, registry integration, compliance workflows, governance procedures, and

implementation methodologies that will remain competitively valuable throughout the current triennial code cycle and the immediately succeeding code cycle.

Public disclosure during this period would allow competitors to replicate significant portions of GSR's operational framework, implementation methodology, and administrative processes without comparable investment in research, development, testing, regulatory analysis, and software implementation.

Accordingly, GSR respectfully requests confidential designation for six (6) years.

5. Legal Basis for Confidential Treatment (20 CCR §2505(a)(1)(D))

Confidential treatment is requested pursuant to:

- Government Code §7927.705 (Trade Secret Exemption);
- Evidence Code §1060 (Trade Secret Privilege); and
- Government Code §7922.000 (Public Interest Balancing Test).

The information for which confidentiality is requested consists of proprietary operational methods, confidential business processes, implementation methodologies, administrative systems, and commercially valuable information developed by Golden State Registry through substantial investment of time and resources.

The information derives independent economic value from not being generally known or readily ascertainable by competitors and is maintained by GSR as confidential business information.

Public disclosure would provide competitors with detailed insight into GSR's operational implementation of the Energy Code Compliance Program while providing little corresponding public benefit because the Commission retains complete access to the document for regulatory review and oversight.

6. Basis Supporting Confidential Designation (20 CCR §2505(a)(1)(D))

(a) Nature of the Competitive Advantage

The application describes GSR's proprietary operational framework for administering the Energy Code Compliance Program, including quality assurance methodology, training systems, registry

integration, certification processes, governance structure, workflow sequencing, and regulatory implementation developed specifically for the 2025 Energy Code.

(b) How the Competitive Advantage Would Be Lost

Public disclosure would enable competitors to duplicate GSR's operational design, administrative procedures, implementation strategies, and integrated compliance framework without undertaking comparable regulatory analysis, development, testing, and implementation efforts.

(c) Value of the Information

The information reflects substantial investment in regulatory research, software development, operational planning, policy development, quality assurance design, training development, and implementation of the 2025 Energy Code Compliance Program. It represents significant intellectual property and competitive business value.

(d) Ease or Difficulty of Legitimate Acquisition

The information cannot be obtained through publicly available sources. Reproducing the operational framework described in the application would require extensive independent regulatory analysis, software development, policy creation, operational testing, and implementation effort.

7. Aggregation or Redaction (20 CCR §2505(a)(1)(E))

Aggregation or redaction is not feasible.

The proprietary operational methodologies, implementation strategies, workflow descriptions, and administrative processes are integrated throughout the application. Redacting isolated portions would not adequately protect the confidential information and would substantially diminish the usefulness of the document for Commission review.

Accordingly, confidential designation is requested for the document in its entirety.



8. Confidential Handling and Prior Disclosure (20 CCR §2505(a)(1)(F))

The application has been maintained as confidential by Golden State Registry and has not been publicly distributed.

Access to the document has been limited to authorized personnel, consultants, legal advisors, and the California Energy Commission as part of the Provider Application review process.

The document is submitted solely for Commission review in connection with GSR's application for approval as an Energy Code Compliance Provider.

9. Certification (20 CCR §2505(a)(1)(G))

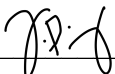
I certify under penalty of perjury that the information contained in this Application for Confidential Designation is true, correct, and complete to the best of my knowledge.

10. Entity Type and Authorization

Golden State Registry is a California business entity operating as a Doing Business As (DBA) of National Energy Testing Institute, Inc.

I am authorized to execute this Application for Confidential Designation on behalf of the applicant.

Jonathan Johnson
Chief Executive Officer
Golden State Registry
(DBA of National Energy Testing Institute, Inc.)

Signature: 

Date: 06/25/2026