

DOCKETED

Docket Number:	25-BSTD-01
Project Title:	2025 Energy Code Compliance Provider Applications
TN #:	272368
Document Title:	Confidentiality Application T7 GSR Software Manual Updated
Description:	N/A
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Organization:	Golden State Registry
Submitter Role:	Applicant
Submission Date:	9/8/2026 1:13:46 PM
Docketed Date:	9/8/2026



APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20, California Code of Regulations, § 2505 et seq.)

CEC-13 (Revised 04/2023)

Application concerning: Exhibit T7-2025 GSR Software Training Manual Updated

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 (including number of pages) of the information or data for which confidential designation is requested (20 CCR § 1208.1)

Title: Exhibit T7-2025 GSR Software Training Manual Updated

Document date: September 8, 2026

Length and format: 281-page PDF.

Description: An updated, screenshot-based training and user manual for Golden State Registry's proprietary online Energy Code Compliance (ECC) registry software. The manual explains GSR's role-based account and company setup, project creation and progression, required data-entry sequences, compliance-document workflows, validation and completion controls, electronic-signature and authorization functions, status tracking, rater and rating-company interactions, Authority Having Jurisdiction access, billing and administrative functions, and other operational features. It depicts GSR's software interface and explains how users navigate the registry to prepare, review, sign, register, and retrieve compliance documentation.

3. Specific part(s) of the information or data for which confidential designation is requested (20 CCR § 2505(a)(1)(B))

GSR requests confidential designation for the entire 281-page document, including all text, screenshots, diagrams, screen layouts, field names, menus, process sequences, examples, user-role descriptions, validations, alerts, status indicators, administrative functions, document-routing instructions, and explanations of registry behavior.

The proprietary information is integrated throughout the manual. Separating individual passages or images would not adequately protect the confidential material because the value lies both in the individual implementation details and in the way those details collectively reveal the architecture, workflow logic, controls, and user experience of GSR's software product.

4. Length of time the CEC should keep the information or data confidential, and justification (20 CCR § 2505(a)(1)(C))

GSR requests confidential designation for six years from the date of the CEC’s confidentiality determination, approximately two triennial Energy Code cycles.

This duration is directly related to the useful competitive life of the information. The manual documents a software platform developed and refined specifically for the 2025 Energy Code cycle, but its workflow designs, controls, interface conventions, registry processes, and implementation methods will remain commercially valuable and applicable through subsequent code-cycle updates. Public disclosure during this period would allow competitors to avoid substantial independent development, testing, compliance analysis, and training-design costs while GSR is still relying on those investments to compete as an ECC Provider and Registry. Six years is limited and reasonable because the competitive value of the depicted version will diminish as regulatory requirements, software architecture, interfaces, and operational practices evolve.

5. Legal basis permitting the CEC to keep the information or data confidential (20 CCR § 2505(a)(1)(D))

The requested material constitutes trade-secret and competitively sensitive commercial information. California Evidence Code section 1060 recognizes a privilege to refuse disclosure of a trade secret when allowance of the privilege will not conceal fraud or otherwise work injustice. California Civil Code section 3426.1(d) defines a trade secret as information that derives independent economic value from not being generally known or readily ascertainable by proper means and that is subject to reasonable efforts to maintain secrecy.

The California Public Records Act preserves confidentiality where disclosure is exempted or prohibited under state law, including applicable privileges (Gov. Code, § 7927.705). The material also warrants withholding under the public-interest balancing provision (Gov. Code, § 7922.000), because disclosure would reveal GSR’s proprietary software design and operational methods, confer a substantial unearned competitive benefit on market participants, and undermine the CEC’s interest in receiving candid and complete technical submissions from applicants. Those harms clearly outweigh any incremental public interest in publication of GSR’s detailed internal implementation. The public can evaluate GSR’s regulatory scope and compliance commitments without access to the proprietary screenshots, workflows, controls, and implementation detail contained in this manual.

6. Trade secrets and loss of competitive advantage (20 CCR § 2505(a)(1)(D))

(a) Specific nature of the advantage

GSR has invested substantial management, technical, legal, compliance, software-development, testing, and training resources to translate California’s ECC requirements into an operational registry platform. The manual reveals how GSR structures user roles and permissions; sequences complex project and document workflows; guides users through data collection; implements required-field, status, signature, and authorization controls; communicates errors and next actions; and integrates compliance documentation into a usable product. This combination of interface design, workflow logic, compliance interpretation, and training presentation gives GSR an advantage in usability, implementation readiness, user onboarding, support efficiency, and regulatory compliance.

(b) How the advantage would be lost

A competitor could use the manual as a detailed product blueprint. The screenshots and accompanying explanations would allow another provider, registry developer, or software vendor to identify GSR's feature set, reproduce or adapt its workflow sequence, imitate its user-facing controls, anticipate its operating methods, and shortcut its own product research, compliance analysis, interface design, testing, documentation, and training development. Disclosure could also expose system behavior and control points in a manner that increases the risk of misuse, circumvention, targeted exploitation, or manipulation. These harms would reduce the return on GSR's investment and weaken the differentiation of its software and services.

(c) Value of the information to the applicant

The information has substantial commercial and operational value. It embodies years of accumulated industry experience and significant expenditures for software engineering, regulatory analysis, workflow design, validation, quality assurance, testing, documentation, and training. It supports GSR's ability to obtain and maintain approval, train users efficiently, reduce errors, deliver registry services, and compete for contractors, raters, rating companies, and other authorized users. Its value is enhanced by the fact that the individual elements are organized into a comprehensive, working system.

(d) Ease or difficulty of legitimate acquisition or duplication by others

The information cannot be readily acquired from public sources. Applicable statutes, regulations, forms, and CEC guidance describe compliance requirements, but they do not reveal GSR's particular software design, screens, field arrangements, navigation, sequencing, validation behavior, permissions, alerts, controls, administrative processes, or training method. Legitimate duplication would require substantial independent regulatory research, software design and engineering, user-experience work, testing, iteration, documentation, and expense. Authorized users receive access only for legitimate program purposes and are subject to account controls and GSR's Terms of Use and confidentiality protections.

7. Whether the information or data can be disclosed if aggregated or masked (20 CCR § 2505(a)(1)(E))

The manual cannot be meaningfully protected through aggregation because it is not a statistical dataset; it is an integrated visual and instructional description of GSR's software and operating workflow. Limited high-level information may be disclosed in a separate public summary that identifies the manual's general purpose and broad subject areas without reproducing screenshots, screen layouts, field structures, workflow sequences, validation logic, permissions, controls, or detailed instructions.

Masking isolated screenshots, fields, or passages would be inadequate because confidential implementation details recur throughout the document and can be reconstructed from the remaining sequence and narrative. Effective masking would require redacting substantially all screenshots and most operative instructions, leaving a document that is fragmented, potentially misleading, and of little informational value. GSR therefore requests confidential treatment of the entire manual while permitting a separately prepared, non-confidential summary.



8. How the information or data is kept confidential and whether it has been disclosed outside the applicant (20 CCR § 2505(a)(1)(F))

GSR treats the detailed contents of the manual and the nonpublic workings of its registry software as confidential and proprietary. Access to the live registry is controlled through verified user accounts, unique credentials, role-based permissions, and administrative activation. GSR restricts the manual and related implementation information to personnel, contractors, professional advisers, prospective or authorized registry participants, and governmental reviewers who have a legitimate business or regulatory need for access and who receive the information under contractual, professional, programmatic, or other confidentiality restrictions or expectations.

The material has not been made generally available to the public. Any limited disclosure outside GSR has occurred only as reasonably necessary for software development and support, legal or regulatory review, application review, training preparation, or controlled use of the registry. Such disclosure does not eliminate trade-secret protection because it is limited in purpose and subject to safeguards intended to prevent unrestricted dissemination. Submission to the CEC is made solely for official review and with this express request for confidential designation.

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. Business entity and authority to apply and certify (20 CCR § 2505(a)(1)(G))

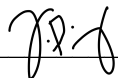
National Energy Testing Institute, Inc. is a corporation doing business as Golden State Registry. I am the Chief Executive Officer of the corporation and am authorized to prepare and submit this application and to make the foregoing certification on behalf of National Energy Testing Institute, Inc. DBA Golden State Registry.

Jonathan Johnson

Chief Executive Officer

Golden State Registry

(DBA of National Energy Testing Institute, Inc.)

Signature: 

Date: 9/8/2026