

DOCKETED

Docket Number:	25-BSTD-01
Project Title:	2025 Energy Code Compliance Provider Applications
TN #:	272412
Document Title:	CEC-13 Confidentiality Request GSR Exhibit T4 T4B Combined
Description:	N/A
Filer:	Jonathan Johnson
Organization:	Golden State Registry
Submitter Role:	Applicant
Submission Date:	9/9/2026 10:40:33 PM
Docketed Date:	9/10/2026

APPLICATION FOR CONFIDENTIAL DESIGNATION

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

CEC-13 (Revised 04/2023)

Application concerning: GSR Exhibit T4 / T4-B - ECC Rater Company & Principal Training Course, Video Script and Student Study Guide - Combined Edition

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: GSR Exhibit T4 / T4-B - ECC Rater Company & Principal Training Course, Video Script and Student Study Guide - Combined Edition

Document date: September 9, 2026

Length and format: 42-page PDF.

Description: A combined training exhibit developed by Golden State Registry for ECC Rater Companies and their certified principals under Title 24, Part 1, section 10-103.3(d)(3). Part I, Exhibit T4, is the complete narration and production script for a 16-module training course. Part II, Exhibit T4-B, is the companion student study guide, organized into the same 16 modules with operative regulatory text, plain-language explanations, summaries, and appendices. Together, the materials address company and principal eligibility, certification, responsibilities, conflicts of interest, separation of services, internal quality controls, Provider quality assurance, discipline and reconsideration, data-registry permissions, annual reporting, code-cycle updates, and preparation for the principal assessment.

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 42-page combined document, including all course text, narration, production directions, on-screen cues, module sequencing, lesson-plan organization, instructional explanations, summaries, examples, study-guide content, selected regulatory excerpts, appendices, and assessment-preparation material.

The confidential and publicly derived material is integrated throughout the exhibit. Although statutes, regulations, and CEC requirements cited in the document are public, GSR's selection, arrangement, sequencing, synthesis, explanation, and presentation of that material form a proprietary course product. Separating individual passages would not adequately protect the confidential material because the competitive value lies in the complete instructional architecture and in the coordinated relationship between the video script and student study guide.

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 three years from the date of the CEC's confidentiality determination, approximately one triennial Energy Code cycle.

This duration is directly related to the useful competitive life of the information. The exhibit was developed specifically for implementation of the 2025 Energy Code cycle, and its course architecture, instructional sequencing, regulatory synthesis, production script, study-guide structure, explanations, and training methods will remain competitively valuable while GSR establishes and administers this training program. Public disclosure during this period would permit competitors to avoid substantial independent curriculum development, regulatory review, instructional design, production planning, and training-validation costs while GSR is relying on those investments to compete as an ECC Provider. Three years is limited and reasonable because the value of this particular edition should diminish as the next code cycle approaches and the governing requirements and training materials are revised.

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, section 7927.705). The material also warrants withholding under the public-interest balancing provision (Gov. Code, section 7922.000), because disclosure would reveal GSR's proprietary curriculum, instructional design, course production plan, and methods for training and evaluating regulated program participants; confer a substantial unearned competitive benefit on other providers or training organizations; and discourage applicants from providing complete training materials during regulatory review. Those harms clearly outweigh any incremental public interest in disclosure of GSR's detailed course implementation. The public can evaluate GSR's proposed training scope and regulatory commitments through a separate high-level summary without receiving the proprietary script and study guide.

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, legal, regulatory, instructional-design, writing, editing, production-planning, and training resources to convert complex ECC requirements into a coordinated course for Rater Companies and their principals. The exhibit reflects GSR's particular choices concerning module order, teaching emphasis, plain-language explanation, regulatory excerpts, on-screen cues, recaps, study-guide structure, and assessment preparation. This integrated approach gives GSR an advantage in training clarity, learner readiness, efficient course delivery, consistent administration, regulatory compliance, and the ability to attract and support ECC Rater Companies.

(b) How the advantage would be lost

A competitor, training vendor, or other market participant could use the combined exhibit as a ready-made curriculum and production blueprint. Disclosure would allow others to reproduce or closely adapt GSR's lesson sequence, narration, explanations, regulatory synthesis, production directions, study-guide format, summaries, and assessment-preparation approach without incurring comparable development and review costs. It would shorten their development time, reduce their training investment, and weaken the differentiation and commercial value of GSR's program.

(c) Value of the information to the applicant

The information has substantial commercial and operational value. It embodies accumulated ECC-program experience and significant expenditures for regulatory analysis, curriculum development, instructional writing, citation verification, course design, production preparation, editing, and quality review. It supports GSR's ability to demonstrate compliance with section 10-103.3(d)(3), train company principals accurately and consistently, administer certification efficiently, reduce misunderstandings and compliance failures, and compete as an ECC Provider and training organization.

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

The information cannot be readily acquired from public sources. The applicable regulations and CEC materials state the governing requirements, but they do not supply GSR's complete 16-module course, narrative teaching script, on-screen presentation plan, plain-language synthesis, coordinated student guide, instructional emphasis, examples, recaps, or assessment preparation. Legitimate duplication would require substantial independent regulatory research, citation checking, curriculum and instructional design, writing, editing, production planning, testing, and expense. The coordination of the two parts and the cumulative teaching method would be especially difficult to reproduce without access to this exhibit.

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

The combined training exhibit cannot be meaningfully protected through aggregation because it is not a statistical dataset. It is an integrated course and study guide whose value lies in the selection, organization, wording, sequencing, and coordination of the instructional content. Limited high-level information may be disclosed in a separate public summary identifying the course's regulatory purpose, its two-part structure, and the general subjects of its 16 modules without reproducing the narration, production cues, detailed explanations, summaries, study-guide content, appendices, or assessment-preparation material.

Masking isolated passages would be inadequate because proprietary instructional choices recur throughout both parts and can be reconstructed from the remaining sequence and cross-references. Effective masking would require redacting most of the operative course and study-guide content, leaving a fragmented document of little informational value. GSR therefore requests confidential treatment of the entire combined exhibit 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 course script, study guide, curriculum structure, and instructional methods as confidential and proprietary. Access is limited to GSR personnel, contractors, professional advisers, production personnel, CEC reviewers, and authorized applicants or trainees who have a legitimate business, regulatory, production, or training need for the material. GSR controls distribution and uses account, contractual, professional, programmatic, or other use restrictions and confidentiality expectations appropriate to the recipient and purpose.

The complete combined exhibit has not been made generally available to the public. Any limited disclosure outside GSR has occurred only as reasonably necessary for regulatory and legal review, course development and production, citation verification, training administration, or controlled participation in GSR's certification program. Such limited-purpose disclosure does not eliminate trade-secret protection because it is subject to safeguards against 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.

Signature	
Name	Jonathan Johnson
Title	Chief Executive Officer
Date	9/10/2026