ADDENDUM:
Staff Paper - Approval Process for Use of an External Digital Data Source

Application Programming Interfaces

The data exchange between the Data Registry and the External Digital Data Source (EDDS) described in the 2019 References Appendices Joint Appendix JA7 (JA7) is expected to be managed by the Data Registry Provider. The data exchange must be performed using industry best practices for security and integrity of the data. If the Data Registry Provider uses an application programming interface (API) to exchange data between an EDDS and the Data Registry, the Data Registry Provider must disclose in the EDDS application information and documentation for each API and EDDS proposed to be used by the Data Registry Provider. This includes a description of any internet-based data gateway interfaces used for sharing compliance data with third parties, and any other information necessary to show compliance with JA7. California Energy Commission (CEC) staff will evaluate this information to:

1) Ensure user authentication and data integrity.

2) Verify compliance with required security of the registry and compliance documents.

3) Evaluate proposed measures to prevent conflict of interest between Home Energy Rating System (HERS) providers and raters/rater companies (each are required to be independent of one another).

As defined by the applicable regulations in JA7, an API is not an EDDS. Approval of an API is not approval of any associated EDDS to which the API would interface. However, although an API is not an EDDS, it is still a data exchange utilizing software tool/technology, since an API acts to exchange data between a Data Registry and at least one EDDS. Pursuant to JA 7.7.1, no data exchange utilizing software tools/technology may be used for the document registration processes required by Title 24, Part 6 unless approved by the CEC.

Therefore, each API used to exchange data utilizing software tools/technology *and* each EDDS must be approved according to the requirements in JA7 prior to use by a Data Registry. (For additional information, see JA7, including but not limited to JA 7.6.3.2.7 and JA 7.7.1.)