|  |  |  |
| --- | --- | --- |
| PUC logo | COMMONWEALTH OF PENNSYLVANIAPENNSYLVANIA PUBLIC UTILITY COMMISSIONP.O. BOX 3265, HARRISBURG, PA 17105-3265 | **IN REPLY PLEASE REFER TO OUR FILE**  |

August 16, 2012

To: Interested Parties

Re: Electronic Filing – Size of Qualified Documents and Paper Copy Requirement

Docket Nos: M-2008-2072592 and L-00070187

The purpose of this Secretarial Letter is to announce that the Public Utility Commission (Commission or PUC), in accordance with Section 501 of the Public Utility Code, 66 Pa. C.S. § 501, is: 1) waiving existing regulations to increase the size limit of qualified documents that may be electronically filed (eFiled);[[1]](#footnote-1) and 2) dispensing with the requirement for a paper copy of eFiled documents to be submitted within three business days, except when the documents exceed 250 pages.

*Increase in Document Size from 5 Megabytes to 10 Megabytes*

Currently, the PUC’s regulations at 52 Pa. Code § 1.32(b)(3) provide that a filing, including attachments, that exceeds 5 megabytes may not be eFiled. In January 2011, the PUC implemented a pilot project to permit filings, including attachments, up to 10 megabytes to be eFiled.

As this pilot project has been successful, the PUC, by this Letter, is officially waiving the existing regulations to permit documents up to 10 megabytes to be eFiled. In addition, the PUC will continue to monitor the size of documents being filed and the effect on the eFiling system to determine whether this size may be further increased. A proposed rulemaking will be initiated in the near future to implement this change and others that may be appropriate given the Commission’s three years of experience with eFiling.

*Paper Copy Filing Requirement*

The PUC’s regulations at 52 Pa. Code § 1.37(b) require the filing of one paper copy within three business days when eFiled documents exceed 250 pages. Although the regulations do not require paper copies of eFiled documents that are less than 250 pages, the Commission has requested that eFilers supply one paper copy of these filings including the eFiling summary page with the confirmation number. By having eFilers submit a paper copy, the Commission has been able to fulfill its obligation to retain a signed original paper copy of all filings and to gain a comfort level with the accuracies of the eFiling system.

The Commission is appreciative of the cooperation of all interested parties in providing paper copies of eFiled documents since eFiling began in February 2009. Having become satisfied with the functionality of this system and having successfully tested a dedicated printer to produce paper copies of eFiled documents, the Commission is now dispensing with the paper copy requirement for eFiled documents that are less than 250 pages.

For eFiled documents over 250 pages, the Commission continues to require the submission of one paper copy within three business days. Moving forward, the PUC will evaluate whether this paper copy continues to be necessary. As has been the practice to date, the signed paper copy that is submitted must include the eFiling summary page containing the confirmation number. This alerts the staff in the Secretary’s Bureau that the document has already been eFiled and does not require further processing.

 In summary and consistent with our regulations, the Commission no longer requires a paper copy of eFiled documents that are less than 250 pages and strongly discourages parties from submitting these extraneous paper copies. If such paper copies are filed, they will not be retained in any document folders. However, if any party insists on submitting paper copies of documents that are less than 250 pages, the paper copies must include the eFiling Summary Page containing the confirmation number, alerting staff in the Secretary’s Bureau that the document has been eFiled.

Any questions about this Secretarial Letter should be directed to Secretary Chiavetta at 717-772-7777.



Very truly yours,

Rosemary Chiavetta

Secretary

cc: Chairman’s Office

Vice Chairman’s Office

Commissioners’ Offices

Bohdan R. Pankiw, Chief Counsel

Office of Consumer Advocate

Office of Small Business Advocate

1. *See* 52 Pa. Code § 1.32(b)(3). [↑](#footnote-ref-1)