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Sent: 4/1/2012 6:17:26 PM

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Cc:

Bcc:

Subject: RE: R.12-03-014 Service SL1

Dear ALJ Gamson:

I join Mr. Reid in seeking clarification of this requirement in the OIR. It will add additional burdens to party participation (different document types required for filing versus service), and it advances the use of Word documents that will not provide the security of a PDF file. Further, in serving parties with the PDF file that was also electronically filed (and not a Word document), it also confirms that each party is receiving the document as filed.

If this is a new rule, would you be so kind to point me to the resolution where it was adopted? I may have missed it. While the OIR cites to Rule 1.10 ("electronic mail service"), subsection (c) only provides that the message must identify the electronic format of the document, with the examples given of permissible document types as "PDF, Excel."

Thank you.

Sara Myers

Attorney for CEERT

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From: Jan Reid [mailto:janreid@coastecon.com]
Sent: Friday, March 30, 2012 5:26 PM
To:

----- Original Message -----

From: [Jan Reid](#)

To: dmg@cpuc.ca.gov

Sent: Friday, March 30, 2012 5:17 PM

Subject: R.12-03-014 Service

ALJ Gamson:

While reviewing the OIR for R.12-03-014, I noticed the requirement concerning electronic service. The OIR states that "The electronic copy should be in Microsoft Word or Excel formats to the extent possible." (OIR, p. 18)

I strongly urge the Commission to reconsider this requirement. Although Word files take up less space than Adobe PDF files, Word files have a number of drawbacks. The page breaks for Word files are often different in different versions of Word. In the past, this has caused chaos in the hearing room and in reply comments. For example, Party A may refer to a quote on page 7 of a document generated by Party B. The quote may appear on page 6 or page 8 of the Word document received by other parties. Additionally, Word documents can be changed by any party which has access to the Word file.

This is not true of .PDF files. Each copy of the PDF file is identical and the page numbers match regardless of which version of Adobe is used to open the file. Additionally, PDF files cannot be changed by a user.

This is one reason that the Commission requires that parties provide PDF files when using the Commission's e-file system. For these reasons, I recommend that parties be required to provide Adobe .PDF files in electronic service.

Regards,

Jan Reid
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