

MIXED MEDIA FILINGS

***CUTTING-EDGE FILING TECHNIQUES TO ACCOMMODATE
MULTIPLE & VOLUMINOUS
MEDIA FORMATS***



**Docket Office
California Public Utilities Commission
San Francisco, CA
June 2021**

WHAT IS MIXED MEDIA?

The term “Mixed Media” is a shorthand description of different media forms assembled by filers which are presented to the Docket Office for formal filing, whether electronically, or in digital formats, such as paper, or in newer technical formats, such as DVDs, CD-ROMs & Portable External Hard Drives (PEHDS).

COMPLIANCE FILINGS

With greater frequency, many utilities are now required to file large amounts of information with the Commission on a regular basis, and the size of these filings are becoming increasingly unwieldy. More Commission decisions now require compliance filings at regular intervals in order to provide staff with updated information on matters of great interest to the Commission.

FILING SIZE KEEPS GROWING

In Addition to Compliance Filings, utilities are now required to provide greater detailed information in many of their new applications, such as General Rate Cases and Energy Resource Recovery Account and related Applications, so the sheer volume easily accounts for documents in excess of 100 pages, including appendices & exhibits. The bottom line is that these are not simple or easy filings.

30 YEAR RECORD RETENTION REQUIREMENT

RESOLUTION L-204: THE LEGAL STANDARD

Notwithstanding the complexities and volume and size of filings, the Legal Standard continues to apply. Resolution L-204, passed 09/20/1978 established the modern day standard for how long a document must be maintained in the official records of the Commission (Archive-Life).

Resolution L-204 set the modern day standard for Archive-life at 30 years.

PDF/A COMPLIANCY

Any document in whatever form filed with the Docket Office that becomes part of the official records of the Commission must have a retention life of at least thirty (30) years. Those documents which do not meet this test are rejected because the document is not **PDF/A compliant**. You may have heard that term: **Portable Document Format/Archive**.

PAPER IS DEEMED PDF/A COMPLIANT

Paper has always been deemed PDF/A compliant because it is well-known to have a shelf life of thousands of years. So, if you submit a hard copy paper filing, there is no PDF/A issue.

LIMITATIONS OF PAPER – SIZE & VOLUME

The only limitations to hard copy filings are size and/or volume. If a filing is very large or voluminous, it will ultimately reach a point where its size and weight make filing it prohibitive. If you add these issues to the fact that all hard copy filings requires “copies,” then, you may have a problem.

FILING MULTIPLE COPIES COMPOUNDS THE PROBLEM

Subject to prescribed exceptions, new filings require one (1) original and six (6) exact copies. [Rule 1.13(b)(1)(i)].

So, if the new filing consists of 300 pages, this filing is prohibitively large!

IS E-FILING DOCUMENTS THE ANSWER?

Why bother with 300 pages of paper if you can file that same 300 page document electronically without issues of number of copies or moving around very large documents?

EFILE LIMITATIONS

Rule 1.13(b)(1)(i) prohibits electronic filings from exceeding **1500 Mb** (1.5 GB) in size.

So, if I have a document that exceeds 1.5 GB in size, how do I file it other than in paper form?

ANSWER: USE **POLYCARBONATE PLASTIC!**

FORMS OF POLYCARBONATE PLASTIC

- Digital Versatile (or Video) Disc (DVD)
- Compact Disc – Read Only Memory (CD-ROM)
- Blu-Ray Disc

These Optical Disc Media forms revolutionized the acquisition, maintenance & transmission of information.

POLYCARBONATE BENIFITS

- They are all very portable, very light and very easy to use, but contain huge amounts of data all in about a 12 cm disc.
- We can now place a whole lot of data, graphs, charts, pictures, drawings and of course, words on a tiny disc we can carry in our pockets !
- But, for filing purposes, there is one paramount condition of the disc used to file documents.

ARCHIVAL-GRADE DVD

The “Original” of the Discs used for filing must be an Archival-Grade DVD in order to be in compliance with the 30-year retention rule. Such DVDs have been shown to have a retention life of at least 30 years and therefore, PDF/A compliant.

COPIES MAY BE PLACED ON CD-ROMs

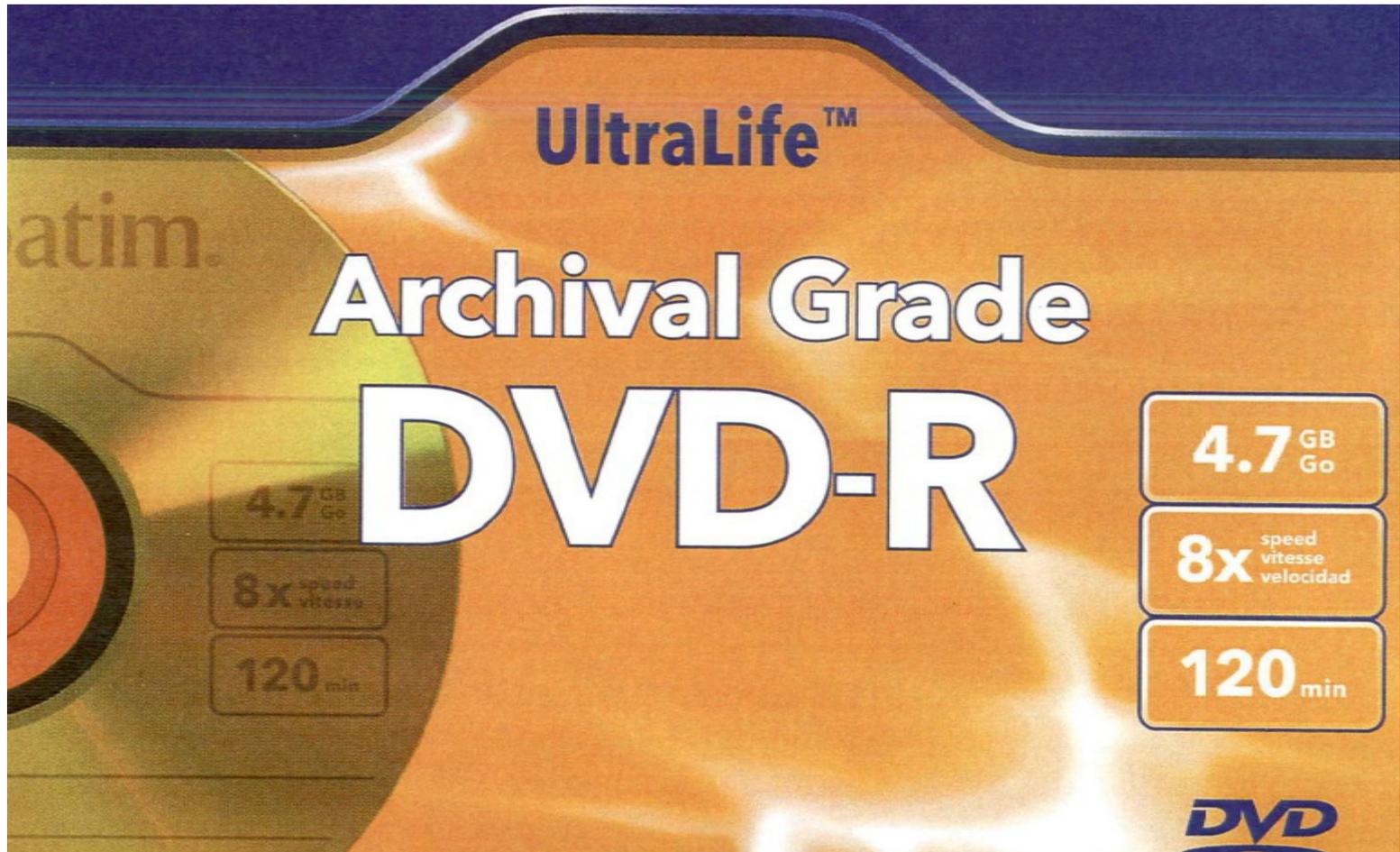
Since the requirement for compliance with the 30-year retention rule applies only to the ORIGINAL of a filing, the copies may be placed on ordinary CD-ROM Discs.

When the Original is created on the DVD, copies should be placed on CD-ROM Discs immediately thereafter to insure uniformity.

NAME-BRAND ARCHIVAL- GRADE DVDS

- ✓ MAM-A GOLD ARCHIVE GRADE
- ✓ VERBATIM ULTRALIFE GOLD ARCHIVE GRADE
- ✓ KODAK GOLD PRESERVATION

ULTRALIFE DVD-R IMAGE



INFORMATION ON DISC LABEL

- ✓ Name of Filer
- ✓ Title of Document and Volume or other designation (e.g., 1 of 3)
- ✓ Proceeding Number (or blank if new)
- ✓ Date of Filing (or blank if new)

TITLE PAGE

(Rule 1.6)

Perhaps, the most important page you can create when filing documents with the CPUC is a Title Page.

The following is a picture of a basic Title Page:

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to
Conduct a Comprehensive
Examination of the California
Teleconnect Fund.

R. 13-01-010
(Filed January 24, 2013)

COMMENTS ON STATE REPORT

*EXHIBIT A IS SUBMITTED IN DISC FORM
BEC ITS SIZE EXCEEDS THE SIZE LIMITATION
OF RULE 1.13(b)(1)(ii)*

MEGAPATH CORPORATION
Katherine K. Mudge,
Vice President,
Regulatory Affairs & Litigation
1835-B Kramer Lane, Suite 100
Austin TX 75758
T-512-794-6197

Email: Katherine.Mudge@megapath.com

Date: February ____, 2013

EXAMPLE

(SLIP SHEET FOR EXHIBIT A IN COMMENTS)

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Conduct a Comprehensive
Examination of the California
Teleconnect Fund.

R. 13-01-010
(Filed January 24, 2013)

EXHIBIT A IS SUBMITTED IN DISC FORM
BECAUSE ITS SIZE EXCEEDS THE SIZE LIMITATION
OF RULE 1.13(b)(1)(ii)

MEGAPATH CORPORATION
Katherine K. Mudge,
Vice President,
Regulatory Affairs & Litigation
1835-B Kramer Lane, Suite 100
Austin TX 75758
T-512-794-6197

Email: Katherine.Mudge@megapath.com

Date: February __, 2013

EXAMPLE - ORIGINAL

(TITLE PAGE SCOTCH-TAPED TO OUTSIDE OF
MANILA ENVELOPES CONTAINING
EXHIBIT A – ORIGINAL)

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Conduct a Comprehensive
Examination of the California
Teleconnect Fund.

R. 13-01-010
(Filed January 24, 2013)

EXHIBIT A TO COMMENTS ON STATE REPORT

ORIGINAL – ARCHIVAL-GRADE DVD

MEGAPATH CORPORATION
Katherine K. Mudge,
Vice President,
Regulatory Affairs & Litigation
1835-B Kramer Lane, Suite 100
Austin TX 75758
T-512-794-6197

Email: Katherine.Mudge@megapath.com

Date: February ____, 2013

EXAMPLE - COPY

(TITLE PAGE SCOTCH-TAPED TO OUTSIDE OF
MANILA ENVELOPES CONTAINING
EXHIBIT A – COPIES (3 or 4))

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Conduct a Comprehensive
Examination of the California
Teleconnect Fund.

R. 13-01-010
(Filed January 24, 2013)

EXHIBIT A TO COMMENTS ON STATE REPORT

❑ *COPY – CD-ROM FORMAT*

MEGAPATH CORPORATION
Katherine K. Mudge,
Vice President,
Regulatory Affairs & Litigation
1835-B Kramer Lane, Suite 100
Austin TX 75758
T-512-794-6197

Email: Katherine.Mudge@megapath.com

Date: February ____, 2013

MANILA ENVELOPES - CLASP TYPE

To properly “house” the Discs at the time of filing, please use Manila Envelopes with the following specifications:

- ✓ Manila
- ✓ 10 x 12 in size with clasp-type closure –no adhesives
- ✓ Securely Scotch-tape proper Title Page to outside along all four (4) edges

EXAMPLE – COPY EXHIBIT

DOC 150810284

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of the East Bay Regional
Park District for an Order Authorizing
Construction of a new grade separated
pedestrian/ bike crossing (001A-19.80-
AD, DOT No. 441041W) over the Union
Pacific Railroad Company's mainline
tracks at milepost 19.79 in the City of
Pinole in the County of Contra Costa.

A. 15-08-011
(Filed August 12, 2015)

FILED
PUBLIC UTILITIES COMMISSION

AUG 12 2015

SAN FRANCISCO OFFICE

EXHIBIT D

FINAL ENVIRONMENTAL IMPACT REPORT

COPIES -
CD-ROM

East Bay Regional Park District
Attn: Sean Dougan, Acting Manager
PO Box 5381
Oakland CA 94605-0381
T-510-544-2611
Email: sdougan@ebparks.org

August 12, 2015

EXAMPLE EXHIBIT

Doc 110810055

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
PUBLIC UTILITIES COMMISSION

JUL 26 2011

SAN FRANCISCO OFFICE
NO. _____

In the Matter of the Application of SAN
GABRIEL VALLEY WATER COMPANY
[U337W] for Authorization to Implement
Discounted Rates for Recycled Water Service
and Apply Facilities Fees in its Fontana Water
Company Division in Accordance With a
Contract With the City of Fontana.

Application No. 11-06-005
(Filed June 2, 2011)

RESPONSE OF
SAN GABRIEL VALLEY WATER COMPANY
TO QUESTIONS PRESENTED BY
ADMINISTRATIVE LAW JUDGE WEATHERFORD

EXHIBIT C

(CD-ROM FORMAT)

Timothy J. Ryan
Vice President and General Counsel
San Gabriel Valley Water Company
Post Office Box 6010
El Monte, CA 91734
Tel.: (626) 448-6183
Fax: (626) 448-5530
E-mail: tjryan@savwater.com

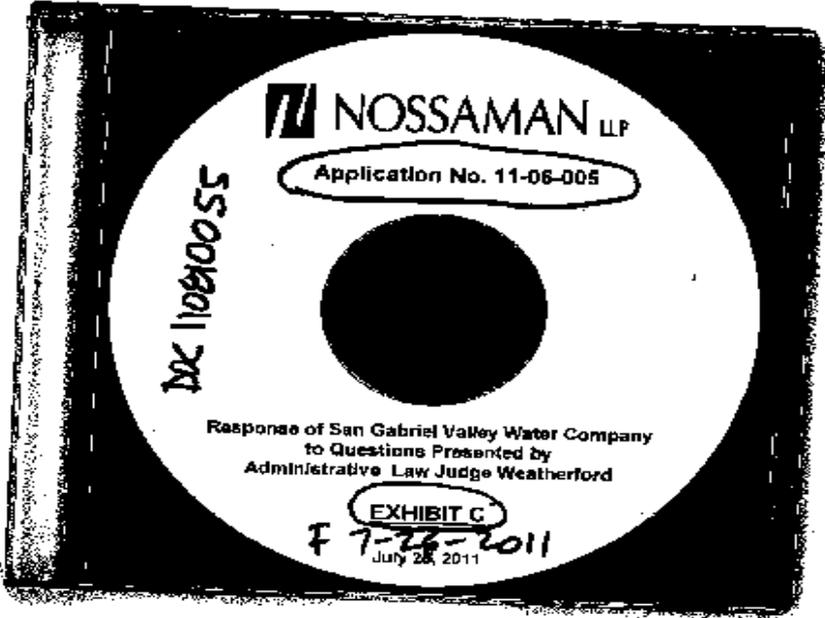
Martin A. Mattes
NOSSAMAN LLP
50 California Street, 34th Floor
San Francisco, CA 94111
Tel.: (415) 398-3600
Fax: (415) 398-2438
E-mail: mmattes@nossaman.com

Attorneys for SAN GABRIEL VALLEY WATER COMPANY

July 26, 2011

260825_LDCC

IMAGE OF DVD



EXAMPLE – ORIGINAL EXHIBIT

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of the City of Sacramento for Authority to construct a new McKinley Village Way Underpass roadway-rail crossing, proposed CPUC Crossing No. 001A-91.60-B, DOT No. 440824N, under the Union Pacific Railroad, within the City of Sacramento, California.

FILED
PUBLIC UTILITIES COMMISSION

AUG -7 2014

SAN FRANCISCO OFFICE

A.14-08-006
(Filed August 7, 2014)

APPLICATION TO CONSTRUCT A NEW MCKINLEY VILLAGE WAY
UNDERPASS ROADWAY-RAIL CROSSING

EXHIBIT D – ENVIRONMENTAL IMPACT REPORT

ORIGINAL – ARCHIVAL-GRADE DVD

CITY OF SACRAMENTO
Jerry Way, Director Public Works
915 I Street
Sacramento CA 95814
T-916-808-6381
Email: jway@cityofsacramento.org

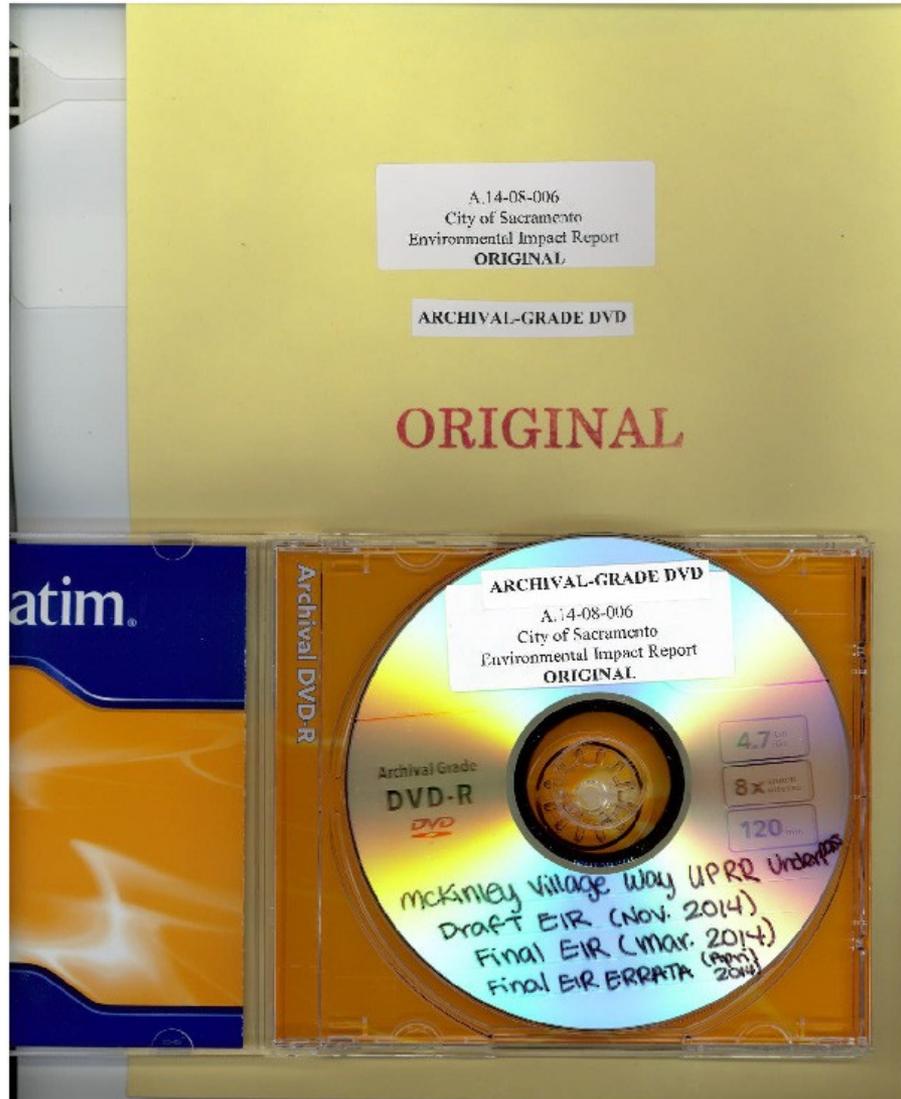
August 7, 2014

ORIGINAL

A1408006 Title Page City Sacramento

Doc 140810318

PICTURE OF ORIGINAL WITH DVD



SERVICE OF MIXED MEDIA FILINGS

[Rule 1.9(a) + (b)]

OPTION 1 - Regular service by Email or U.S.P.S.

OPTION 2 – Personal Delivery

OPTION 3 - Notice of Availability

OPTIONS 1 & 2

Regular Service by Email or via United
States Postal Service

or

Personal Service by Hand-Delivery

OPTION 3 - Notice of Availability -Rule 1.9(d)

A Notice of Availability (NOA) is a legal document that deals with the issue of service of documents which are tendered for filing. Normally, the document that is filed is the document that is served. However, if the document is too large for service, for example, i.e, exceed 1.5 GB in size, it cannot be served directly by Email.

NOA

- The concept of the NOA is you don't serve the subject document. Instead, you serve **notice of where parties can get a copy.**
- Requests for a copy per the NOA must be fulfilled within one business day after receipt of the request.
- In essence, it is an easy method by which to "FILE" a very large or voluminous document, in Disc form, at the same time, having the ability to properly & timely SERVE it as required by Principles of Due Process.

NOTICE OF AVAILABILITY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED
2-16-16
04:59 PM

Order Instituting Rulemaking to Develop
and Adopt Fire-Threat Maps and Fire-
Safety Regulations.

Rulemaking 15-05-006
(Filed May 7, 2015)

**RESPONSE TO RULING OF ADMINISTRATIVE LAW JUDGE
DATED JANUARY 22, 2016 CONSISTING OF (I) THE FINAL MAP REVIEW &
DEVELOPMENT REPORT, INCLUDING THE FINAL VERSION OF
FIRE MAP 1; (II) FOUR (4) HARD DRIVES CONTAINING THE UNDERLYING
DATA AND MODELS USED TO PRODUCE FIRE MAP 1; AND
(III) A NOTICE OF AVAILABILITY FOR ACCESSING THE HARD DRIVES**

NOTICE OF AVAILABILITY

RASHID A. RASHID
Attorney for

The Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2705
Rashid.Rashid@cpuc.ca.gov

February 16, 2016

158623870

NOA - CONTINUED

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop
and Adopt Fire-Threat Maps and Fire-
Safety Regulations.

Rulemaking 15-05-006
(Filed May 7, 2015)

**RESPONSE TO RULING OF ADMINISTRATIVE LAW JUDGE
DATED JANUARY 22, 2016 CONSISTING OF (I) THE FINAL MAP REVIEW &
DEVELOPMENT REPORT, INCLUDING THE FINAL VERSION OF
FIRE MAP 1; (II) FOUR (4) HARD DRIVES CONTAINING THE UNDERLYING
DATA AND MODELS USED TO PRODUCE FIRE MAP 1; AND
(III) A NOTICE OF AVAILABILITY FOR ACCESSING THE HARD DRIVES**

NOTICE OF AVAILABILITY

The California Public Utilities Commission's (Commission) Safety and Enforcement Division (SED) provides this Notice of Availability (NOA)¹ regarding the filing of the Final Map Review and Development Report, Fire Map 1, and all technical data associated with the development of Fire Map 1.

The technical data and information associated with the creation of Fire Map 1 are contained on portable external hard drives (PEHD).

This NOA contains information regarding how parties may access the PEHD.

Appendix A of this NOA contains information detailing the name, type, and a brief description of all files contained on the PEHD.²

¹ The Administrative Law Judge (ALJ) provided oral and written instructions to SED to file and serve the NOA. *See Administrative Law Judge's Ruling Providing Instructions for Filing and Serving Documents* (filed December 8, 2015) and *Administrative Law Judge's Ruling* (filed January 22, 2016).

² The Commission's docket office provided the instructions regarding Appendix A.

CERTIFICATE OF SERVICE

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED
2-18-16
04:59 PM

Order Instituting Rulemaking to Develop and
Adopt Fire-Threat Maps and Fire-Safety
Regulations.

Rulemaking 15-05-006
(Filed May 7, 2015)

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of **RESPONSE TO RULING OF ADMINISTRATIVE LAW JUDGE DATED JANUARY 22, 2016 CONSISTING OF (I) THE FINAL MAP REVIEW & DEVELOPMENT REPORT, INCLUDING THE FINAL VERSION OF FIRE MAP 1; (II) FOUR (4) HARD DRIVES CONTAINING THE UNDERLYING DATA AND MODELS USED TO PRODUCE FIRE MAP 1; AND (III) A NOTICE OF AVAILABILITY FOR ACCESSING THE HARD DRIVES** to all known parties by either United States mail or electronic mail, to each party named on the official attached service list in **Rulemaking 15-05-006**.

I hand-delivered a hard copy to the assigned Administrative Law Judge's mail slot.

Executed on February 17, 2016, at San Francisco, California.

/s/ VIOLETA MANGUNDAYAO
VIOLETA MANGUNDAYAO

158623897

IN SUMMARY

So, now you know how to “file” information that is contained in media other than paper. We even showed you how to file a “Hard Drive.” Even if it is a stand-alone Hard Drive, we have the means to file it. Literally, we can “file” anything legally unless the applicable law or the Administrative Law Judge states otherwise.

END OF PRESENTATION

**Questions or issues can be
emailed to:**

Efile-Help@cpuc.ca.gov