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800 North Third Street, Suite 301, Harrisburg, Pennsylvania 17102
Telephone (717) 901-0600 • Fax (717) 901-0611 • www.energypa.org

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January 16, 2008

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James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Comments of the Energy Association of Pennsylvania to
Proposed Rulemaking to Permit Electronic Filing
Docket No. L-00070187

INDEPENDENT REGULATORY
REVENUE COMMISSION
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Dear Secretary McNulty,

On September 10, 2007, the Pennsylvania Public Utility Commission ("PUC" or "Commission") entered a Proposed Rulemaking Order at Docket No. L-00070187 to Permit Electronic Filing. Comments were solicited from interested parties 60 days from publication of the Order in the Pennsylvania Bulletin which occurred on November 17, 2007.

This letter provides comments from the Energy Association of Pennsylvania ("EAPA") on behalf of its member companies, the major electric and natural gas distribution companies in the Commonwealth. EAPA comments are minor in scope and EAPA commends the Commission on the extensive stakeholders process employed to develop the instant proposed regulations which represent a transitional step toward replacing paper with electronic filing.

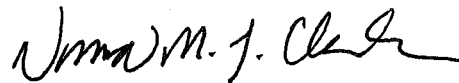
Specifically, with respect to the definition of "PDF-Portable Document Format" found at Section 1.8, EAPA notes that a PDF document cannot be "copied, without restriction". In other words, the PDF format does not allow for modification of the document. It can be printed but to the extent the regulation was intended to allow modification of the document this would not be possible. EAPA suggests eliminating the words "and copied" so that the definition would read: "The PDF document and attachments, when feasible, shall be capable of being printed, without restriction, and may not require a password to view the contents of the document".

Proposed Rulemaking to Permit Electronic Filing
Docket No. L-00070187

Further, with respect to the Date of Filing (§1.11), EAPA suggests replacing the phrase "local prevailing time" with "local Harrisburg, Pennsylvania time" to avoid any confusion in the event the filing were made from a different time zone.

EAPA and its members thank the Commission for the opportunity to comment on these proposed regulations and are looking forward to the introduction of the electronic filing of documents at the PUC.

Very Truly Yours,



Donna M. J. Clark
Vice President & General Counsel

Cc: Jamie M. McClintock, Esquire
(Law Bureau)