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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Amendment of Paper Copy and	:	L-2012-2324073
Electronic Copy Filing Requirements	:	L-2012-2296005
	:	L-00070187
	:	M-2012-2317481
	:	M-2008-2072592

**COMMENTS OF THE  
ENERGY ASSOCIATION OF PENNSYLVANIA IN SUPPORT OF THE PROPOSED  
RULEMAKING ORDER ENTERED FEBRUARY 28, 2013**

On February 28, 2013, the Pennsylvania Public Utility Commission ("PUC" or "Commission") entered a Proposed Rulemaking Order ("Order") recommending a number of modifications to its existing Rules of Administrative Practice and Procedure (at 52. Pa. Code Chapters 1, 3 and 5, Subchapter D) to facilitate significant savings of both time and resources for parties appearing before the Commission and for Commission staff.

The Commission's proposal to initiate a formal rulemaking to amend the document filing procedural regulations is the culmination of a comprehensive study by an internal Efficient Work Group ("EWG"), a successful pilot test period, a July 19, 2012 Rulemaking Order<sup>1</sup> reducing certain paper filing requirements and an August 16, 2012 Secretarial Letter<sup>2</sup> ("Secretarial Letter") in which certain existing regulations were waived regarding paper copy requirements and increased size limits for qualified documents pending the rulemaking process.

In its Order, the Commission proposes first to reduce and, in some cases, eliminate paper filing requirements and second to increase the limit on size requirements for qualified electronically-filed documents. These amendments are expected to result in significant savings

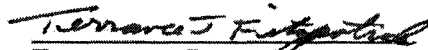
<sup>1</sup> PUC Proposed Rulemaking Order at Docket No. L-2012-2296005 entered July 19, 2012.

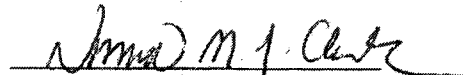
<sup>2</sup> PUC Secretarial Letter at M-2009-2072592 and L-00070187 issued August 16, 2012.

of time and resources for both parties participating in Commission proceedings and for Commission staff. The Order invites written comments from interested parties to the proposed amendments enumerated in Annex A<sup>3</sup> within 30 days of publication in the *Pennsylvania Bulletin*, which occurred on March 9, 2013.

The Energy Association of Pennsylvania<sup>4</sup> ("EAP") applauds the Commission's initiative to review and streamline the procedural regulations for document filings and supports the proposed amendments in Annex A as set forth in the Order. EAP looks forward to working with the Commission as it continues to seek to simplify current processes so as to promote efficiency and administrative economy in its regulatory role.

Respectfully submitted,

  
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Date: April 8, 2013

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<sup>3</sup> A corrected Annex A was distributed by the Commission via Secretarial Letter on March 8, 2013 to replace the original version distributed with the February 28, 2013 Proposed Rulemaking Order.

<sup>4</sup> Members of EAP include Citizens' Electric Company; Columbia Gas of PA; Duquesne Light Company; Equitable Gas Company, LLC; Metropolitan Edison Company; National Fuel Gas Distribution Corporation; PECO Energy Company; Pennsylvania Electric Company; Pennsylvania Power Company; Peoples Natural Gas Company, Peoples TWP, LLC; Philadelphia Gas Works; Pike County Light & Power Company; PPL Electric Utilities Corporation; UGI Central Penn Gas, Inc.; UGI Penn Natural Gas, Inc.; UGI Utilities, Inc.; Valley Energy, Inc.; Wellsboro Electric Company; and West Penn Power Company.