

The California Public Utilities Commission Improves Efficiencies With Electronic Filing

Open Text Document Management, eDOCS Edition Helps Provide Better Access to Public Files and Saves Time



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Angela Minkin,
Administrative Law Judge,
CPUC

The California Public Utilities Commission (CPUC) regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies in addition to authorizing video franchises.

This involves filing and managing thousands of documents for new applications, complaints, investigations, and policy rulemakings. Filers range from law firms and utilities to small businesses and individuals.

The paper files involved in these processes is very intensive, and CPUC needed a system that enabled quick and easy filing, more efficient

management of the documents, and better access for the general public.

Too Much Paper, Not Enough Access, Lost Files, and Rogue Copies

Prior to June 2006, all filings were submitted in multiple copies on paper. Some of the applications involve thousands of filings that were quite large. “At one time, we had a system in which we asked people to file the original form plus 12 copies so that we could distribute them within the commission. I remember a rate case a couple of decades ago when a utility company literally used a truck to deliver the files for some of its testimony,” says Kale Williams, Staff Information Systems Analyst at CPUC. “In looking at that, we realized that putting things in electronic form would save us an awful lot of paper—as well as time. It took a lot of time to run that paper around and stamp it and store it and do all of the various things involved in a transaction.”

The CPUC also knew that an electronic filing system would be much more useful for the general public in addition to the people who practice before the commission. “No one would have to create an original form and 12 copies and then hire a truck to bring it over. They could just put it online and do it ten minutes before the filing was due,” explains Williams. “For the general public, it would give everybody who was interested in the case access to all of the documents 24 hours a day, 7 days a week, rather than having to be a party to the case or to come to the commission, go into our Central Files room, have the

file pulled, and then sit there going through it. And if you wanted a copy, it cost \$0.20 a page. So electronic filing was intended to increase public access as well.”

In the past, CPUC staff would have to physically search for information. They had to go to their Central Files Office, look for the documents, and sign out the files. Then they would often experience one of the biggest problems related to paper files: some went missing. Williams explains, “Some people might work on a case for years, and they’d keep the files with them. They’d retire, and the files would just disappear.”

In terms of compliance, CPUC knew they needed to do something to keep their files in order. “We’re required by law to retain and archive the files, so we need to make sure that our files, which are the official records of the commission, are intact and easy to find,” says Angela Minkin, Administrative Law Judge at CPUC.

CPUC staff could also get information by requesting extra copies from the utility or from various practitioners and other parties participating in their proceedings. “Pretty soon we would just have a proliferation of paper all over the commission,” says Minkin. “We might have had one official set of documents but several working copies. It was so paper intensive—it certainly wasn’t very green.”

The CPUC expected benefits from e-filing for both filers and the Commission. Filers would save on the preparation, printing, and shipping costs associated

with submissions. They would also have additional time to prepare and submit filings before deadlines, since printing, assembly, and shipping would no longer be a factor. The e-filing process would cut CPUC staff time and costs associated with filing, processing, and storing documents. It would also reduce the effort and cycle time for handling exceptions such as requesting and reprocessing re-submitted filings.

Manage Online Files with Open Text

CPUC has used Document Management (DM) solutions from Open Text on various projects since 1995, including using an earlier version of Open Text eDOCS (formerly Hummingbird DOCS Open). In 1998, when a law was passed that required them to put certain documents, such as meeting agendas and associated documents online so they would be available to the public, they turned to Open Text again to create their Web publishing system.

Working with Open Text partner, General Networks, the commission used the Application Programming Interface (API) for the DM solution and some customized Visual Basic 6.0 code to modify the document management libraries. “We set up a publishing system in which a staff member can open a document in our internal library, save a copy into our Web publishing library, and set it for publication sometime in the future,” says Williams. “There are all sorts of bells and whistles in there. It can create a PDF and does automatic meta-data checking and things like that.”

Easy Integration and Electronic Filing

“In 2005, when we began to think about electronic filing,” explains Williams, “we knew that we wanted to be able to provide users with an online application for submitting their documents and to publish those documents as soon as they were accepted for filing. We already had our Web publishing system, and we wanted to leverage that investment since there was no customization required to integrate with Open Text.”

Industry

Utilities

Customer

California Public Utilities Commission

Business Challenges

- Difficult access to public files
- Several copies of files circulating
- Paper-intensive system

Business Solution

- Open Text Document Management, eDOCS Edition

Business Benefits

- Secure access to public files
- Improved productivity
- Better information searches
- Faster processes
- Increased efficiencies
- Savings of time and costs

As with any organization, cost was an issue, and CPUC weren't interested in introducing a separate system, so before they submitted an RFP, they considered what Open Text could do for them.

Minkin explains, “One of our constraints as a state agency is that we are always trying to be as cost effective as possible. We did not receive additional funds from the state to implement this project so we had to use our own budgeted funds. We also had some challenges because we really wanted the electronic filing system to work with and populate as many different databases as possible in the Web publishing system. It had to integrate easily.”

Open Text Document Management, eDOCS Edition was a perfect fit for CPUC. They could use their existing Web publishing system with very few modifications; they simply added a separate module to handle only electronically-filed documents. “We were able to use almost all of the work that we had done on our Web publishing system for electronic filing,” says Williams. “There's an open standard in California called ‘Second-Generation Electronic Filing Standards’ that we have to comply with, so we used Essential Publishers to develop the front end because they have a lot of experience with electronic filing in the California courts. This was easily done in conjunction with eDOCS DM from Open Text.”

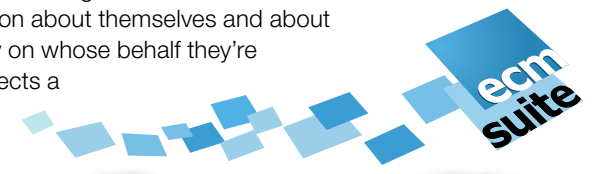
Quick and Easy Implementation

The implementation began in January 2005, and CPUC had a pilot program in place by May of the following year. The pilot program included several divisions of the commission as well as one outside party, a major utility, Southern California Edison, all filing their documents electronically throughout the summer. The program was officially launched to the general public in September 2006.

In addition to the pilot program, CPUC did a lot of testing on the main interface at efile.cpuc.ca.gov. “We had a lot of focus groups, and we tried to get every level of filer we had, from the very big utilities to sole practitioners to the general public who file intermittently. We tested out this interface on a lot of different people before we settled on what is there now,” says Williams.

Improved Processes

Williams explains the new, streamlined process which, he says, has essentially offloaded the data entry work to the filers. “A filer goes online, fills out some information about themselves and about the party on whose behalf they're filing, selects a



document, attaches it, and then submits it. After that's done, the information goes to the Agency Review Module (ARM), where people in our docket office look at it and determine whether it's appropriate for filing. If they accept all of the information, it goes through the submission process and is converted to XML. After it's accepted, that XML is parsed and some of the information in there is inserted into our Oracle case management system. The Open Text and Oracle systems work perfectly together."

"The information gets put into the Oracle database," continues Williams. "And then it gets picked up by another application, which imports the document into a separate DM library that we call 'e-file.' The access to e-file is really very restricted because that's the repository for the official documents of record. Most people on the commission don't even know it's there. After the file is put into the e-file library, a copy is moved over to the Web publishing library, and it's published online. And that's what most people see."

The Web publishing library is now the one central repository where all up-to-date electronically filed documents are kept, and everyone from CPUC staff to California utilities to the general public looks there for files. The directories are organized by document type, e.g., one for applications, one for complaints, etc., and there are two ways to search for documents. "One is through a database query, using the Open Text API," explains Williams. "You can use one of the various canned searches and search for just decisions, rulings, things like that. The other way is to use a free-form search page on our Web site, where you can fill in any criteria you want: for example, show me all of the rulings filed in a certain case between October 2008 and May 2009."

"And if staff within the commission needs to find out what's going on, it's much easier for them to access the filings that are online as well. It really is that access to everything for decision-makers within the commission, for staff within the commission, for practitioners, and for the general public," says Minkin.

Smooth Training and High User Adoption

Training on the system went very smoothly because it was designed for the users. "People came in and worked really closely with our docket office staff so that the ARM reflects exactly how the staff does their work," says Williams.

Adds Minkin: "There was a lot of concern about getting staff buy-in and making sure that our folks were comfortable with this project. Kale, along with Ken Henderson, who was the project manager at the time and now Michelle Cooke, who is an Assistant Chief ALJ, have done a great job of outreach. They continue to not only work with our staff, but they really are very careful and considerate about working with our filers and making sure issues and questions are resolved. Since it's not a mandatory system, they continue to try to bring more potential filers under the tent because it's really so much easier for everybody."

The utilities were anxious to have electronic filing with CPUC because it saves them a lot of time. "They can file from anywhere in the country; they don't have to be in the office. We worked with them as much as we could to make sure that the system we developed actually meets their needs," says Williams.

CPUC has an impressive 92 percent e-filing rate. "It is just such an Internet world now; people expect to be able to do things online," says Williams. "We have somewhere around 6,000 or 7,000 electronically filed documents per year, representing around 1,000 unique filer names."

Reduction In Paper and Processing Time Improves Career Paths for Staff

CPUC enjoys several benefits with e-filing from Open Text. "Our docket office used to have a run between 4:30 and 5:00 p.m.; people would just show up at the counter carrying piles of paper, and there'd be lines going out the door. Now filers don't need to make all of those copies. They can wait till five minutes to 5:00 p.m., if they want to,

and send it electronically. They just have to press a button." And once a document is filed, an online receipt is available with a link to the document online.

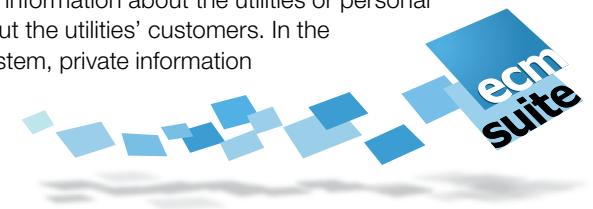
There has also been a significant decrease in processing time. It takes CPUC staff approximately two days to process a paper document as opposed to only a third of a day to process an e-filed document. With an ROI like that, CPUC is pleased with their results.

One surprising benefit of the new system is that they have been able to redeploy staff. Minkin explains, "It's opened up new career paths for staff because electronic filing requires more analysis rather than simply processing. Our staff has been able to receive promotions and take more civil service exams. It's opened up some new and exciting opportunities for them." And no one on either side, filers or staff, would ever want to go back to paper.

Another concern CPUC was trying to address was the number of backlog files. "The judges are under pretty strict legislative timelines for resolving our proceedings, so if files are backed up in the docket office and aren't getting to our judges in a timely way, it can really cut into our time for dealing with the substantive issues," says Minkin. "Not only do we now have great participation from our filers and the public, reduced processing time, and greater opportunities for staff, we also have more satisfied judges who can achieve their time commitments."

Future Plans for a Paperless Office

Within the next five years, the commission hopes to get rid of the Central Files Office altogether. "We're aiming at that elusive paperless office," states Williams. Currently, they still have confidential files that may contain proprietary business information about the utilities or personal data about the utilities' customers. In the future system, private information



would be filed as a sealed document, and the filer would receive a password to access it. There would also be a secure audit trail of who has accessed the document. "We're working on a system to securely receive confidential information that will bring in all of the supporting documents that are used during a proceeding, such as testimony and work papers. We're looking at ways to put all of that online so the entire record of a case is available, not just the formal pleadings," says Williams.

Conclusion

Electronic filing with eDOCS DM from Open Text provides CPUC with not only better access to public information, more efficient management of documents, and a major savings in paper, they also have the added benefits of reduced processing time, greater opportunities for staff, and very satisfied clients.

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