



## Electronic Filing Questions and Answers March 6, 2009

**Q1.** Is it acceptable in the signature line to indicate "s/n" instead of an actual signature or can that be accomplished either way?

**A1.** A signature designation of "/s/ Name" is required per 199 IAC 14.13. Handwritten signatures are not required in an electronic document because documents showing a handwritten signature are often scanned and not word searchable.

**Q2.** Is a certificate of service still needed? And if so, should it be revised to reflect that pleadings are being served through the IUB electronic filing system to parties able to receive electronic service?

**A2.** Rule 14.16(1) provides that no additional proof or certificate of service is required in matters in which all parties are able to receive electronic service. For a document that is filed electronically in a case where all the parties are using the EFS, no certificate of service is necessary. Nevertheless, if you want to use a certificate of service for documents filed electronically, you can, and there is no specific wording required. You could use a statement attesting to the fact that service was made in a manner complying with the Board's rules, or, more specifically, that service was made either by U.S. mail or through the Board's electronic filing system.

There are two instances where a certificate of service will be necessary because service will be made outside of EFS: (a) Initial filings should be filed electronically but are not served through EFS to any party other than OCA. So, for initial filings, you will have to serve a paper copy of the document to everyone except the OCA and a certificate of service will be necessary. (b) In cases where someone is participating in a proceeding on paper and is not able to receive service electronically through EFS, you will have to send (serve) them a paper document with a certificate of service. For documents served on paper, you can use the suggested language above or model your certificate after Board rule 2.2(16).

**Q3.** Are cover letters still necessary?

**A3.** Cover letters are necessary. They tell IUB's Records and Information Center what the filing is about. See the example attached.

**Q4.** Are transmittal sheets still necessary?

**A4.** No. Please do not file a transmittal sheet. The cover letter should contain the information that would have been on a transmittal sheet. See cover letter example attached.

- Q5.** In new 2009 dockets, OCA will automatically receive the document directly from the IUB via the electronic filing system. If there are other parties to the proceeding, do they automatically receive copies too?
- A5.** In all 2009 dockets, OCA will receive the notification via EFS. For an initial filing, the filer is required to send the filing to other affected parties. In an established docket, EFS will notify the other parties unless they are unable to be served electronically or unless the information is confidential. Parties are always required to directly serve confidential material on all other parties except OCA. The rules regarding electronic service can be found at 199 IAC 14.16.
- Q6.** The “Summary of Orders and Filings” in EFS is organized differently than the “Daily Summary of Filings and Orders” in the prior environment. Previously all Board orders were grouped together at the beginning of each daily list. Is there an easy way to look at just Board orders on the new listing?
- A6.** One option is to use the Edit/Find function to search for the word “Order” in the summary page. This will navigate from one order to the next order. Another option is to use the document search feature. On the document search page, you can select a document type of “Order, Board”. Then you can tailor your search further by selecting a date or date range or by filling in any of several searchable fields.
- Q7.** How do I indicate what company the filing is being submitted for?
- A7.** Because filings may be made for multiple parties, it is necessary to build that list by adding each company. To do that, there is an area in the filing information where submitting party information can be selected or entered. If the company is in the company drop-down list, find and select them, **then click add**. Clicking add inserts the company name into the larger box with a “remove” button next to it. If the company is not in the company drop-down list, type the company name into the text box below the drop-down, then click add. Again, clicking add inserts the company name into the larger box with the “remove” button next to it. Once the larger box has all the submitting parties in it, you can move on to other parts of the form. It is important to remember that you must add the company to the larger submitting party box (**by clicking add**) in order for the information to be saved in the filing information.
- Q8.** I am submitting several documents in a single filing. Please provide some guidance on naming the filing and documents.
- A8.** When naming filings and documents, it is important to keep in mind that one great benefit of EFS is the ability to find documents once they are filed. In order to make each document easier to find, names of filings and documents should be descriptive without being verbose.

Remember to be as clear, consistent, concise, and complete as possible within EFS constraints. When a filing contains a single document, it may make sense for the filing title and document title to be the same. However, when a filing contains multiple documents, each document should have a unique name that describes the document itself. See the Standards for Electronic Information or the User Guide for examples.

- Q9.** What are the limits in number of characters for filing titles, document titles, and file names in EFS?
- A9.** Filing and document titles may be up to 200 characters. The filename for the actual file you attach has an 80-character limit. If the filename is too long, EFS will be unable to process the filing. For example, you might attach a file from C:\My Documents\EFS Documents for Filing\RPU-2009-xxxx\Testimony of Dr. John Doe.doc. This file name is 84 characters long including spaces – too long for EFS to handle. To work around this, shorten the folder names or move the file to a folder closer to the root. For example, shorter folder names might be C:\My Documents\EFS Docs\RPU-2009-xxxx\Testimony of Dr. John Doe.doc, which is 67 characters long. A folder closer to the root might be C:\My Documents\RPU-2009-xxxx\Testimony of Dr. John Doe.doc, which gives a filename that is 59 characters long.
- Q10.** Regarding compliance filings - since they are not new dockets in 2009, but are filed electronically, will OCA be sent an electronic copy or is it necessary for filers to still send to OCA?
- A10.** Periodic compliance filings made under the Iowa Administrative Code sections for 2009 should be filed electronically and will have "docket numbers" like IAC-2009-1904 (where 2009 is the year and 1904 indicates 199 IAC 19.4). OCA will receive notification about those through EFS as they do other dockets. Compliance filings in proceedings continuing on paper should continue to be made on paper.
- Q11.** If an administrative assistant will be actually uploading the filings into the system, what registered user ID should he/she use?
- A11.** In order for notification to be provided to the person responsible for the filing and for that person to show on the service list, the attorney or company employee responsible for the filing should be the registered user. The administrative assistant's email may be entered as an alternate email address.
- Q12.** What are the file size limits for uploading files into EFS?
- A12.** Smaller files are better in general than large files. They are faster to upload and download and quicker to search through. EFS has a practical limit of about 5 MBs per document. Files larger than that are slow to load for viewing or download. If it is necessary to split a file because of size, be sure to name the pieces in a way that makes sense so users can put them back together easily.
- Q13.** How will users be notified if the EFS system is down?
- A13.** If the outage is expected to last more than 30 minutes and the IUB Web site is available, a notice will be posted on the IUB Web site (<http://www.state.ia.us/iub>) and, if possible, an email will be sent to registered users. Scheduled maintenance will be posted on the IUB Web site.
- Q14.** What happens if my filing is rejected?
- A14.** If a filing is rejected, Records Center will provide the filer a reason for the rejection. The filer will receive the rejection notice. Notification of a rejected filing will not be provided to other parties on the service list or to the Office of Consumer Advocate (OCA) or IUB

staff. All documents in a rejected filing must be re-submitted once the appropriate corrections have been made.

**Q15.** My filing was rejected and I re-submitted it the following day. Does the rejected filing count toward meeting my filing deadline?

**A15.** Only a filing that is accepted for filing on or before the filing deadline will meet the deadline. If a filer is unable to resubmit the filing before the deadline, it should be re-submitted as soon as possible and accompanied by a request to accept a late filing.

**Q16.** I wanted to search for ARB dockets so chose that in the drop-down box but my search results showed RPUs. What happened?

**A16.** For all searches that have drop-down boxes, the drop-down box stays "active" until you click off it or fill in information in another field. While it is active, scrolling your mouse will scroll through the list, highlighting a different choice and possibly giving you an unexpected result. To avoid this, select your choice, then click somewhere else on the screen to lock in your choice. It is also a good idea to review the information you've entered on the search screen before hitting the search button.

**Q17.** How can I search for multiple industries in the docket search?

**A17.** Find the industry list on the docket search page. Then hold down the Ctrl button and click on each industry you want to include. The highlighted industries will be included in the search. (To unselect an industry, hold the Ctrl button and click again.) Only one industry can be selected in the company and document searches.

**Q18.** Can I use the Summary of Orders and Filings to find a company annual report?

**A18.** Annual report filings are not listed in the Summary of Orders and Filings because there are so many company annual reports filed in a short time period. Annual report filings can be found by doing a docket or document search for docket type A - Annual Reports. Other filings that are not listed in the Summary unless they are Board Orders include Customer Contribution Fund (CCF-docket) filings, Report (R-docket) filings, and Miscellaneous (M-docket) filings.

**Q19.** Once I have started to add documents to my filing, can I use the Browser back button to go back to edit information I entered on the previous screen?

**A19.** No, if you need to make changes to the information you entered about the filing once you've begun to add documents, you must cancel the filing and start again. Using the back button in the browser will cause unexpected results and is likely to cause your filing to be incomplete.

**Q20.** What happens if I forget to hit the submit filing button?

**A20.** If you have added documents to your filing and you close your browser without hitting either the submit filing or cancel filing buttons, or you leave your browser open for more than 30 minutes with no activity, Records Center may receive an incomplete filing. Records Center will generally try to contact filers with an incomplete filing that has been in the processing area for longer than 30 minutes during regular business hours.

**Attachment: Sample Cover Letter**

Company Letterhead

Date

Judi Cooper, Executive Secretary  
Iowa Utilities Board  
350 Maple Street  
Des Moines, IA 50319-0069

RE: ***Company Name*** (INITIAL FILING)  
Docket No. (***Docket Number***)

Dear Secretary Cooper:

Enclosed please find (***Company's***) (***description of filing***) (***optional -- for the period beginning date, ending date***), as filed today on EFS.

[Include any other information needed by the Board to properly identify and process the information in the filing.]

Very truly yours,

*/s/ Name of Person Responsible for the Filing*

Name of Person Responsible for the Filing  
Title of Filer