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

Application of Pacific Gas and Electric Company
for Authority, Among Other Things, to Increase
Rates and Charges for Electric and Gas Service
Effective on January 1, 2017. (U39M)

Application 15-09-001
(Filed September 1, 2015)

**MOTION TO THE COMMISSION AND TO THE EXECUTIVE DIRECTOR
TO DIRECT THE FILING OF DOCUMENTS,
TO REQUIRE COMPLIANCE WITH THE PUBLIC RECORDS ACT,
AND TO REQUIRE ACCEPTANCE OF FUTURE ADA-COMPLIANT PDF/A
FILINGS**

SCOTT RAFFERTY
1913 Whitecliff Court
Walnut Creek CA 94596
(202)-380-5525
rafferty@gmail.com

Attorney for CAUSE

Dated: May 9, 2017

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BACKGROUND

Systematic, but arbitrary, rejection of filings tendered by CAUSE has all but excluded CAUSE from the administrative record of this rate case. Attempting to resolve these rejections has placed enormous burdens on CAUSE, requiring the expenditure of substantial professional fees. Based on the limited public records that the Commission has made available, at least ten documents filed by CAUSE are presently “in queue” and have been for up to 43 days¹. In addition, at least 15 documents have been rejected since November 2015², and other documents were acted only more than three months after they were filed. In eight of these cases, there is no available receipt.³ In others, notices of rejection or acceptance have not been received, even though required by [20 C.A.R. 1.14\(b\)\(2\) & \(c\)\(2\)](#). In one case, the docket office conceded that the records as submitted had been “deleted from the system,” eliminating any paper trail to permit judicial review of the error, in apparent violation of [Government Code 6200](#).⁴ Attachment 1 shows the status of each of CAUSE’s filings. Upon information and belief, all of these rejected or queued documents do comply with PDF/A, even though alleged non-compliance is the most frequently cited reason for rejection (when any reason has been given). Many of the documents that have not yet

¹ Transactions 106570, 106601, 106705, 107037, 107039, 107266, 107268, 107277, 107564, 107628

² Transactions 95084, 92409, 95346, 95344, 106551, 106793, 106794, 107559, 106795, 100683, 100984, 101156, 101275, 102197, 103614.

³ Transactions 95561, 95349, 92408, 95084, 92409, 95346, 95344, 95349.

⁴ There may be additional errors in the Commission’s data, for example, the indication that one document was accepted 95 days before it was even submitted.

been accepted are unidentified in the filing history that the docket office makes available to CAUSE, but they appear to include (1) motions to reconsider the rejection of CAUSE's notice of intent to seek intervenor compensation ("NOI") in two rate cases (A.15-09-001 [here](#)), (2) [its comments on the settlement in A.15-09-001](#),⁵ (3) its [comments on the Alternate Proposed Decision in A.15-09-001](#). These documents can only be accessed on [PG&E's website](#). Several notices required by SB 215 have either been rejected or placed in queue without notice to CAUSE. Although CAUSE's [testimony in A.15-09-001](#) has apparently been admitted into evidence, it is not physically accessible in the administrative record. Pursuant to [20 C.A.R. 1.14\(e\)](#), CAUSE moves that the Commission, the Executive Director, or the Administrative Law Judge (ALJ) direct that the documents be filed. CAUSE also seeks internal administrative review of the Commission's failure to meet its responsibilities under the Public Records Act in a timely and complete fashion. The Commission should produce the "document history" forms and other communications related to the rejected filings.

CAUSE spent many hours demonstrating that the filings complied with PDF/A, but these efforts were dismissed or ignored. The ALJ, whose own rulings and proposed decision use an obsolete and non-accessible format, wrote privately: "if Docket says the format wasn't PDF/A, we have to go with that, so let's not contest that,

⁵ In this case, the stated basis for rejection was the unwritten rule against filing comments in addition to joint comments, which is not typical of other commissions or a reasonable reading of any Commission rule.

..., just re-submit and be certain of the format.”⁶ As CAUSE tried to explain, it had no idea why the docket office was rejecting the filings. CAUSE desperately attempted every obsolete version, with and without accessibility. No approach was consistently accepted for filing.

Since e-filing is mandatory, the provision of [20 C.A.R. 1.14](#) that a tendered document is “not filed” until accepted by the docket office is constitutionally suspect, especially because [§1.14\(b\)](#) does not explicitly provide that the docket office must accept documents that comply with all written rules. The maintenance of submissions by CAUSE in queue for lengthy periods or the failure to notify CAUSE of the rejection reflects the inability of the docket office to state any valid “ground for rejecting the document.” [§1.14\(c\)\(2\)](#). The Ninth Circuit has made clear that pre-clearance requirements for district court filings “impose a substantial burden on the free access guarantee,” which require “an adequate record for appellate review.” Ringgold-Lockhart v. County of Los Angeles, [761 F.3d 1057, 1062](#) (9th Cir. 2014). The same federal rights apply to the compilation of an administrative record in this Court, which is subject to judicial review and to judicial enforcement of federal rights. [Public Utilities Code 1756](#), et seq.; [42 U.S.C. 1983](#); [42 U.S.C. 12233](#). Certainly, screening to prevent the dissemination of viruses is appropriate, but there should be a paper trail to document all attempted filings. What is extraordinary about these particularly exclusions is that

⁶ Email, ALJ Roscow to Rafferty, August 15, 2016, 10:10.

they appear to be based, not on violation of any written standard, but on CAUSE's compliance with state and federal civil rights laws to ensure that administrative proceedings are accessible to the disabled. Commission decisions and rulings almost certainly violate these laws by using obsolete software that produces PDF/A-1b documents that blind citizens cannot access with adaptive technologies. The ALJ and docket office have excluded CAUSE documents either because they use current, accessible software or for some unstated, and presumably impermissible, reason.

After CAUSE failed to receive responses to requests for telephone calls or emails from the docket office⁷, it filed [Public Records Act request 17-85](#) for communications between the ALJ and docketing office regarding the rejected filings. The Commission asserted inability to comply with the statutory deadline, and also claimed that "rejection of a filing" and "compliance with the ... PDF/A standard" were "subjective concepts" which rendered the request for records "vague." Then, the Commission asserted that the ministerial act of accepting a party's filing was actually "deliberative," rendering factual claims made to the ALJ by the docket office privileged from disclosure. Finally, the Commission undertook to "diligently engage in locating" what it asserted was "an extensive number of records." 39 days after the request, the Commission waived privilege by producing a single document and seven screenshots, in support of a

⁷ E.g., email, Rafferty to Nakahara, et ano., March 29, 2017 at 15:00; Rafferty to ALJ Roscow, August 29, 2016, 4:58 (regarding phone calls to docket office). ***Much*** more extensive detail can be provided if there is any dispute as to the alleged non-responsiveness of the docket office.

narrative claiming that CAUSE's documents were properly rejected as non-compliant with PDF/A. The selectively disclosed documents show the reverse. They corroborate both of the explanations that CAUSE had initially proposed:

- (1) The docket office was testing for some obsolete version or lower conformance level of the PDF/A standard than CAUSE used (but the rejections continued after CAUSE downgraded its documents).
- (2) The docket office was not simply verifying the metadata, which showed PDF/A compliance, but manipulating the documents in ways that could take them out of PDF/A compliance.

CAUSE has not yet located a filing by any Commission entity that conforms to international standards of document accessibility for the disabled. The ALJ's rulings use both a non-standard format and the most limited and obsolete form of PDF/A.⁸

I. THE SELECTIVE TESTING OF CAUSE DOCUMENTS WAS ARBITRARY, DISCRIMINATORY, AND INACCURATE.

The selective testing of documents tendered by CAUSE has been arbitrary and discriminatory. CAUSE complied with the newest version of the PDF/A standard, using the conformance level accessible to the disabled: PDF/A-3a. Some of the most experienced intervenors before this Commission, such as TURN ([metadata here](#)) and CUE ([metadata](#)), have documents accepted that do not comply with any version or

⁸ The metadata in the ALJ's documents indicate PDF 1.3, a proprietary format in use from 1999, and PDF/A-1b, which is normally based on PDF 1.4, which was published by ISO. CAUSE does not know how this combination will affect the sustainability of these documents.

conformance level of PDF/A.⁹ Many PG&E documents comply with PDF/A, but the motion to settle A.15-09-001 does not. SED's safety reports on PG&E and SCE were produced using Nitro Pro 9.5.1.12 freeware, which created a document that conformed to PDF 1.3, a proprietary format Adobe abandoned in 2001, that is incompatible with the PDF/A extension. ([metadata](#)) President Picker's alternative proposed decision used Gnostice PDF Toolkit 5.0.0.121 and created PDF/A-1b:2005 document. [ORA's comments](#) used the same freeware to conform to PDF/A-1b ([metadata](#)). The ALJ's proposed decision ([metadata](#)) and rulings, such as the [Scoping Memo](#), also used the Gnostice freeware to produce the non-accessible level of the 2005 standard. CAUSE, probably the intervenor least able to afford the costs of defending its filings, was singled out for arbitrary treatment.

In further irony, as an apparent attempt to excuse his denial of CAUSE's NOI, the ALJ criticized CAUSE for "deficiencies and obvious inconsistencies" that "indicate a lack of attention to detail that is not acceptable in filings with the Commission." Feb. 2, 2017 ruling at 8. Almost none of errors the ALJ cited would have occurred if the docketing office had accepted the initial NOI, which complied with PDF/A-3a, and avoided the creation of at least six additional versions, each attempting to convert and reconvert files using different software and conformance levels in vain efforts to satisfy the docket office. Because the current version of PDF/A

⁹ The comments of the Consumer Federation of California appear always to comply with PDF/A.

accommodates spreadsheets, but the 2005 version does not, the process of downgrading to this obsolete version treated a table as an image to be OCR'd, introducing 3 stray "1"s, which the ALJ called out as "typographical errors." Because the earlier versions of PDF/A did not embed all fonts, downgrading introduced formatting irregularities into the text layer, about which the ALJ also complained.

II. CAUSE's DEMONSTRATIONS OF PDF/A COMPLIANCE HAVE BEEN DISMISSED AND IGNORED.

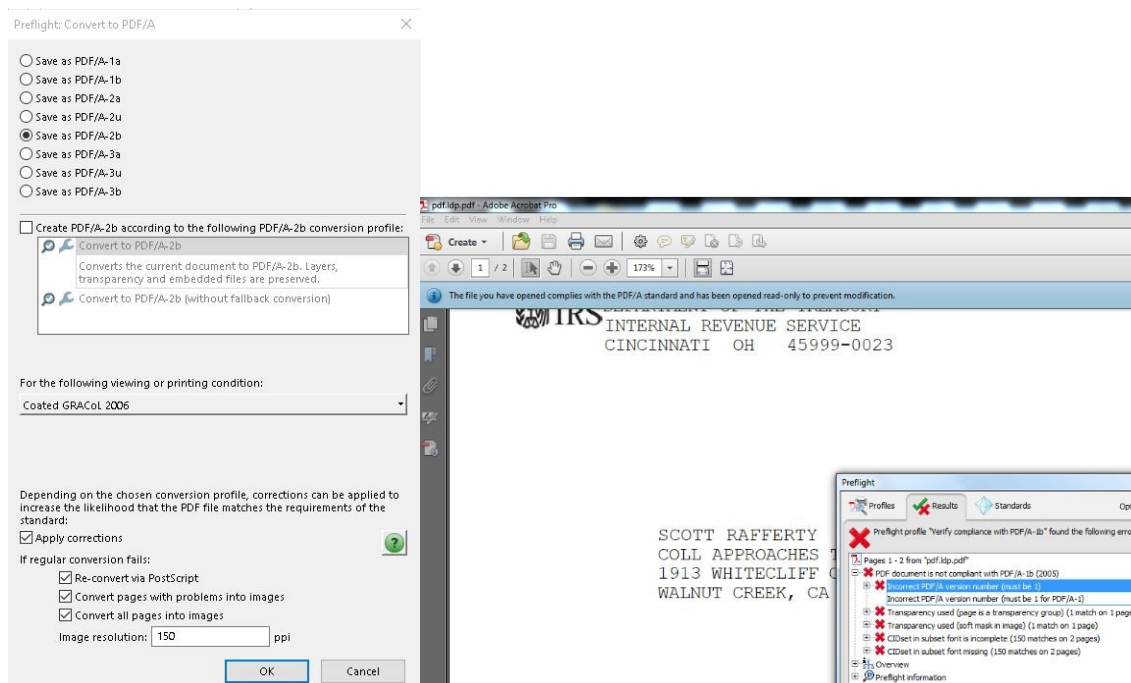
In August 2016, CAUSE wrote the ALJ and President Picker meticulously verifying the many steps it had taken to ensure that its documents complied with PDF/A. [Attachment 3](#). CAUSE explained that the docket office's claim that filings had "fatal errors" was incorrect and possibly based on an incorrect understanding of that term. In each subsequent filing, CAUSE routinely provided screenshots of metadata for the main document as part of its certificate of service, affirming under penalty of perjury that the documents were PDF/A-compliant. All was to no avail.

Ultimately, CAUSE filed the Public Records Act request 17-85 on March 11, 2017, seeking communications by the docket office regarding the rejected documents. After asserting that the responsive documents were voluminous, the Commission waited 39 days before producing just one document, one redacted email reply and five fragmentary screenshots. On August 10, 2016, since PDF/A-3 had not worked, CAUSE

served and filed duplicate versions of a filing in PDF/A-1 and PDF/A-2.¹⁰ The docket office created yet another version using its own software, which the Records Act response claimed was “rejected for non-compliance.” In reality, even the docket office version complied with PDF/A-1a.

The most curious screenshot is provocatively entitled “CAUSE’s PDF/A errors (1).” It is the metadata from a two-page fragment extracted from one of CAUSE’s filings and entitled PDF.LDP.PDF. At this point, the docket office is testing its own creation, not the document as filed. Still, a blue banner reads: “The file you have opened complies with PDF/A and has been opened read-only to prevent modification.” The screenshot shows that the office did not inspect the metadata, but used the “Preflight” module to convert the document into PDF/A-1b. As shown on the left (screenshot not provided by Commission), Preflight in the current version of Acrobat allows saving into any of the eight combinations of version and conformance level. As shown on the right, the docket office imposed PDF/A-1b compliance.

¹⁰ “A1509001 - CAUSE - Motion to Amend NOI (160810)(A).pdf” and “A1509001 - CAUSE - Motion to Amend NOI (160810).pdf.”



Every “error” makes clear that the document did comply with a later version of PDF/A. “Version number must be 1 for PDF/A-1.” The document used special characters and transparency: important features that are fully supported in PDF/2 and PDF/3, but not in PDF/1. It should not have taken a Public Records Act request to elicit the information that CAUSE’s documents were being rejected for using current software, but the docket office had been completely nonresponsive to phone and email inquiries.

In the redacted email reply, a docket office employee agrees to convert the file into PDF/A-1b, suggesting that he understood that the office was requiring the use of this obsolete, non-accessible format, despite the fact that CAUSE’s documents complied with the current PDF/A standard.

III. PDF/A-1b, WHICH THE DOCKET OFFICE IS REQUIRING, HAS BEEN OBSOLETE SINCE 2011 AND PRODUCES DOCUMENTS THAT ARE NOT ACCESSIBLE TO PERSONS WITH DISABILITIES.

When the undersigned drafted the Telecommunications for the Disabled Act, [47 U.S.C. 255](#), Chairman Bryson and this Commission were ardent supporters of the standard of “reasonable accommodation” to the disabled, which became the model for the subsequent [Americans with Disabilities Act](#) (ADA), 42 U.S.C. 12101, et seq. Under regulations implementing [Section 202 of the ADA](#), this Commission is required to make each service (including review of its dockets) “readily accessible and usable by persons with disabilities” unless doing so would result in a “fundamental alteration of the nature of a service” or in “undue financial and administrative burden.” [28 C.F.R. 35.150\(a\)\(3\)](#). It is unconscionable that any public agency, let alone this Commission, formerly a champion of the disabled, would selectively exclude parties from participation in regulatory processes unless they strip from their filings assistive technologies that Section 255 and the ADA almost certainly require, especially when accessible filings are just as widely readable by other users as those produced with the Commission’s obsolete, non-compliant technology. The irrational insistence on anachronistic technology also precludes the use of spreadsheet objects, special characters, and many other features that are convenient, if not essential, in regulatory filings.

[20 C.A.R. 1.13\(b\)\(1\)\(i\)](#) specifies PDF/A. The rules do not require the use of the non-accessible and obsolete version of PDF/A that the Commission uses in creating its own documents, nor can the Commission permit its docketing office to violate state and federal law by imposing arbitrary ad hoc requirements that discriminate without any rational purpose. If a requirement that regulatory filings be non-accessible violates Access Board regulations, it automatically violates [Government Code 11135\(b\)](#). Violations of the ADA cause violations of the Unruh Act, [Civil Code 51\(f\)](#), and the Disabled Person's Act, [Civil Code 54\(c\)](#).

[ISO 19005-1](#), published in 2005, was the first standardization of Part A of the PDF format. It was based on [PDF 1.4](#) (Acrobat 5), a format developed by Adobe, and designated PDF/A-1. PDF 1.3, the proprietary Adobe format used by the ALJ in the case, was already obsolete. The original standard had two conformance levels: [PDF/A-1b](#) (basic) and [PDF/A-1a](#) (accessible). The accessible version added several requirements necessary to enable documents to be spoken by screen readers, such as character mapping to include symbols and multiple languages¹¹ and some recognition of structural hierarchy (i.e., optional designation of headings and footnotes). By 2011, the PDF format itself had been standardized as [ISO 32000-1](#), also known as PDF 1.7, which was used as the basis for [PDF/A-2](#), which replaced PDF/A-1. Version 2 of Part A

¹¹ ISO/IEC 10646:2003 plus Amendment 1 ([2016 update](#))

added a number of important features –font embedding¹², image compression¹³, layering of optional content, highlighting or shading, digital signatures and the ability to combine documents. CAUSE (and other parties) typically use these features, so their documents generally do not conform to PDF/A-1b. PDF/A2 added an intermediate conformance level, u, which supports the extended character set, but does not provide other accommodations to the disabled. The current version, PDF/A-3, maintains the three conformance levels, and adds the critical capacity to embed spreadsheet, word-processed documents, computer-aided designs, and other objects that are typically included in regulatory filings. In 2014, [ISO 14289-1](#) established the “Universal Accessibility” extension for PDF (or [PDF/UA-1](#)). Unlike PDF/A, PDF-UA permits encryption, if it provides exceptions for access by screen readers and other assistive technology. It also requires tagging for structure, color, and formatting, which is only optional in the PDF/A-3a standard. These requires make it difficult for scanned material to conform. The Library of Congress has already specified PDF/UA as preferred for native digital content.¹⁴ Effective next January, federal agencies will not be allowed to purchase authoring tools (*i.e.*, Word, Acrobat) that do not permit saving text documents in PDF/UA. [36 C.F.R. 1194, App. C, 504.2.2.](#) *See also*, [29 U.S. Code § 794d\(a\)\(1\)\(A\)\(ii\)](#) (Access Board to establish standards). The current version of

¹² ISO/IEC 14496-22, which is used by TrueType and PostScript ([2017 update](#))

¹³ [ISO/IEC 15444-2](#) (JPEG2000)

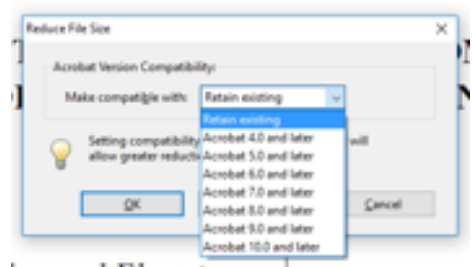
¹⁴ <https://www.loc.gov/preservation/digital/formats/fdd/fdd000350.shtml>

Microsoft Word (version 1703) does not yet meet this requirement. As of now, PDF/UA is not yet widely enough available to be a required accommodation for access by the disabled.

But the exclusion of the current standard is completely irrational. It is almost implausible that, at any time in the future, software could read the proprietary 2001 format used by the ALJ or the 2005 PDF/A non-accessible standard required by the docket office, but not be able to read PDF/A-3a,

which is current in 2017. ISO conformance levels should not be confused with Adobe compatibility

levels, which limit how many *earlier* versions of the



software can read a document. Acrobat offers users the option of reducing file size by eliminating backward compatibility with reading software from Acrobat 4.0 (1999) to Acrobat 10.0 (2010). The Commission does not specify which older versions of Acrobat documents must be compatible with. So far, Acrobat has maintained forward compatibility, so that current software can read all past file formats. However, a basic assumption regarding document sustainability is that earlier digital formats will become inaccessible sooner than more recent standards.

Federal courts have held that the ADA prefer conformance level “a” in court filings, but sometimes tolerate non-accessible filings as “acceptable only if you have no

other option for creating PDF/A.”¹⁵ There is no other known case of **prohibiting** accessible documents, and requiring litigants to submit formats that disabled persons cannot interpret. Even if such a discriminatory practice were legal, which it is not, it would violate basic values of this Commission, which has previously championed Section 225 and the rights of the disabled generally.¹⁶

CONCLUSION

The arbitrary exclusion of CAUSE documents has compromised the integrity of the administrative record. The ALJ and docket office have ignored repeated demonstrations that these files comply both with 20 C.A.R. 1.14, which requires PDF-A, and also with international standards, state and federal laws promoting access for the disabled. It is profoundly unjust for the Commission to use outdated freeware that imposes enormous burdens on a start-up intervenor and excludes blind Californians from access to the regulatory process, while allowing established parties to file documents that do not comply with basic archival standards.

Dated: May 9, 2017

¹⁵ See, e.g., <http://www.oked.uscourts.gov/creating-pdf-a-documents-acrobat> , see also http://c.ymcdn.com/sites/www.flclerks.com/resource/resmgr/PDFA_The_New_Court_Document_.pdf (Florida state courts). The California Supreme Court purports to prohibit all PDF/A, believing that the content is “locked.” <http://www.courts.ca.gov/24590.htm>

¹⁶ <http://consumers.cpuc.ca.gov/taddac/>

By: _____/s/_____

SCOTT J. RAFFERTY

SCOTT J. RAFFERTY
1913 Whitecliff Court
Walnut Creek, California 94596
(202)-380-5525
E-mail: rafferty@gmail.com

Attorney for

COLLABORATIVE APPROACHES TO
UTILITY SAFETY ENFORCEMENT

Att. 1: CAUSE DOCUMENTS ACCEPTED, REJECTED AND IN QUEUE

Proceedin	Lead Docum	Date of action	Days to action	Current Status	Description from receipt
A1509001	Motion			IN QUEUE (28 days)	A.15-09-001 CAUSE Motion to Excuse Conditions and Find Eligible for IC.pdf -... A.15-09-001 CAUSE Motion to Excuse Conditions and Find Eligible for IC (CO... A.15-09-001 CAUSE NOI amended 170405.pdf - Request (1 MB) A.15-09-001 CAUSE NOI amended 170405 Att. 1 (COS).pdf - Certificate Of Serv... A.15-09-001 CAUSE NOI amended 170405 Att. 2 (prev filed Motion to Late-File... A.15-09-001 CAUSE NOI amended 170405 Att. 3 (Motion to Excuse Conditions ... A.15-09-001 CAUSE NOI amended 170405 Att. 4 (residential bill).pdf - Attachm... A.15-09-001 CAUSE NOI Amended 170405 Att. 5 (Bylaws).pdf - Attachment (37... A.15-09-001 CAUSE NOI amended 170405 Att. 6 (customer authorization).pdf -
A1509001	Request			IN QUEUE (28 days)	amended 170405 Att. 1 (COS).pdf - Certificate Of Serv... A.15-09-001 CAUSE NOI amended 170405 Att. 2 (prev filed Motion to Late-File... A.15-09-001 CAUSE NOI amended 170405 Att. 3 A.15-09-001_CAUSE Ex Parte Communications 170426.pdf - Exparte (679 KB) A.15-09-001_COS to CAUSE ex parte.pdf - Certificate Of Service (750 KB)
A1509001	Exparte			IN QUEUE (7 days)	A.15-09-001_CAUSE Notice of Ex Parte Meeting Requests_03-21-17o.pdf - Exp.
A1509001	Exparte			IN QUEUE (43 days)	A.15-09-001_CAUSE Opening Comments on APD_04-21-17s.pdf - Comments (9... A1509001-CAUSE Opening Comments - Certificate of Service_s.pdf - Certific.
A1609001	Motion			IN QUEUE (20 days)	A.15-09-001_CAUSE Opening Comments on APD_04-21-17s.pdf - Comments (9... A1509001-CAUSE Opening Comments - Certificate of Service_s.pdf - Certific...
A1509001	Comments			IN QUEUE (8 days)	A.15-09-001_CAUSE Opening Comments on APD_04-24-17.pdf - Comments (95... A1509001-CAUSE Opening Comments - Certificate of Service - cover.pdf - Ce...
A1509001	Comments	4/26/2017 9:34	1.69	REJECTED at 04/26/17 09:34 AM	A.15-09-001_CAUSE Opening Comments on PD_03-20-17a.pdf - Comments (1 ... A.15-09-001_COS to CAUSE Opening Comments Standard on PD_3-20-17.pdf -... A1509001 CAUSE
A1509001	Comments	3/28/2017 15:25	7.81	REJECTED at 03/28/17 03:25 PM	A.15-09-001_CAUSE Opening Comments on PD_03-20-17s.pdf - Comments (1 ... A.15-09-001_COS to CAUSE Opening Comments Standard on PD_3-20-17.pdf -.
A.1509001	Comments	3/21/2017	-8.76	ACCEPTED at 03/21/17 04:59 PM	A.15-09-001_CAUSE Reply Comments on PD_03-27-17.pdf - Reply (655 KB) A.15-09-001_COS to CAUSE Reply Comments Standard on PD_3-27-17.pdf - C... A.1509001 Appendix to Reply Comments of CAUSE (Proposed changes to Fin...
A1509001	Reply	3/30/2017 10:49	2.70	REJECTED at 03/30/17 10:49 AM	A.15-09-001_CAUSE Reply Comments on PD_03-27-17a.pdf - Reply (745 KB) A.15-09-001_COS to CAUSE Reply Comments Standard on PD_3-27-17.pdf - C... A.1509001 Appendix to Reply Comments of CAUSE (Proposed changes to Fin...
A1509001	Reply	3/30/2017 11:04	2.62	REJECTED at 03/30/17 11:04 AM	A.15-09-001_CAUSE_Motion Late-File Response to Ruling on NOI.pdf - Motion... A.15-09-001_COS to CAUSE Motion to Late File.pdf - Certificate Of Service
A1509001	Motion			IN QUEUE (40 days)	
A1509001	Exparte	5/1/2017 11:32	34.63	REJECTED at 05/01/17 11:32 AM	A.15-09-001_CAUSE_POST-MEETING NOTICE OF EX PARTE_03-27-17.pdf - A.15-09-001_COS to CAUSE Post-Meeting Notice of Ex Parte.pdf - Certificate ...
A.1509001	Notice	10/24/2016	2.05	ACCEPTED at 10/24/16 04:59 PM	A1509001 - CAUSE - Amendment to the NOI (PDFA1a2005).pdf - Notice (658 KB) A1509001- Certificate of Service - CAUSE amended NOI PDFA1a.pdf - Certific...
A1509001	Motion	8/12/2016 11:41	1.83	REJECTED at 08/12/16 11:41 AM	A1509001 - CAUSE - Motion to Amend NOI (160810)(A).pdf - Motion (588 KB) a1509001 - CAUSE - Motion to Amend NOI - CoS.pdf - Certificate Of Service (A1509001 - CAUSE - Motion to Amend NOI (160816)(PDF-A).pdf - Motion (199 KB) A1509001 - CAUSE - Motion to Amend NOI - CoS (PDF-A).pdf - Certificate Of S... A1509001 - CAUSE - NOI attachment - IRS letter (PDF-A).pdf - Attachment (120... A1509001 - CAUSE - NOI attachment (Bylaws)(PDF-A-2b).pdf - Attachment (191... A1509001 - CAUSE - NOI.pdf - Attachment (346 KB) A1509001 - CAUSE - Motion to Amend NOI (160816)(PDF-A).pdf - Motion (199 KB) A1509001 - CAUSE - Motion to Amend NOI - CoS (PDF-A).pdf - Certificate Of S... A1509001 - CAUSE - NOI attachment - IRS letter (PDF-A).pdf - Attachment (120... A1509001 - CAUSE - NOI attachment (Bylaws)(PDF-A-2b).pdf - Attachment (191... A1509001 - CAUSE - NOI.pdf - Attachment (346 KB)
A1509001	Motion	10/20/2016 9:16	51.69	REJECTED at 10/20/16 09:16 AM	
A1509001	Motion				

number 0000106794, received on 3/28/2017 has been rejected by the Clerk for the following reason:** A.15-09-001. CAUSES REPLY COMMENTS ON THE PROPOSED DECISION OF ALJ ROSCOW.* * 1.Document is submitted late.* YOUR COMMENTS WAS RECEIVED AFTER 5PM ON 3/27/2017 AND WAS THUS LATE. HOWEVER, THE

This is a notification that the filing you submitted in to the California Public Utilities Commission, transaction number 0000107559, received on 4/24/2017 has been rejected by the Clerk for the following reason:** Replaced by Trans. 107564.* * IMPORTANT: For future reference, if you want to replace an earlier efilng, please send an

E-file #102197 submitted on 9/30/2016.* * 1.Other: This filing is rejected pursuant to ALJ Roscows e-mail dated 10/19/2016.* * Thank you. George Lau, Docket Office. Tel: (415) 703-4722. Dated: 10/20/2016.

08/10/16 and resubmitted 08/24/16 in A15-09-001* 1. Document is not PDF/A compliant as required by Resolution ALJ-188: the main document and both attachments in support of the motion contain PDF/A fatal errors. The certificate of service is PDF/A-compliant.* 2. Please make the corrections and re-file the document(s) as soon as you are able. If the document deficiencies are cured within seven days, the document will be filed as of

A.15-09-001. CAUSES REPLY COMMENTS ON THE PROPOSED DECISION OF ALJ ROSCOW.* 1. Other: This reply comments exceed the five page limit and is rejected at your request stated in the replacement e-file #106793.* Thank you. George Lau, Docket Office. Tel: (415) 703-4722. Dated: 3/30/2017.

A.15-09-001. NOTICE OF EX PARTE MEETING.** * 1. Notice was not signed. (Rule 1.8(a))* THE NOTICE WAS NOT SIGNED; PLEASE SIGN OR PUT /S/ ABOVE THE NAME. THE COS WAS FINE.* * 2. Please make the corrections and re-file the document(s) as soon as you are able. If the document deficiencies are cured within seven days, the document will be filedas of the original date it was tendered for filing (Rule 1.14(d)).* * 3. When you re-file, check the box on Tab 1 labeled Resubmission, and enter the receipt number of the original filing that was rejected. If your filing has been rejectedmultiple times, list all receipt numbers in Tab 4 in the box for Filer Notes.* * 4. When you re-submit the document(s), do not change any dates on the document(s).* * Thank you. George Lau, Docket Office. Tel: (415) 703-4722. Dated: 5/1/2017

MOTION TO AMEND NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION.** * 1. Document is not PDF/A compliant as required by Resolution ALJ-188.* THE MOTION IS NOT PDF/A COMPLIANT; THE COS IS FINE. PLEASE RE-FORMAT.** * 2. Please make the corrections and re-file the document(s) as soon as you are able. If the

transaction number 0000100984, received on 8/19/2016 has been rejected by the Clerk for the following reason:1. Other: Rejected pursuant to the Email message from the undersigned, dated August 24, 2016, which message is incorporated by reference herein as though set forth in haec verba.MARTIN NAKAHARA, Senior Legal Analyst

This is a notification that the filing you submitted in to the California Public Utilities Commission, transaction number 0000101275, received on 8/29/2016 has been rejected by the Clerk for the following reason:** A.15-09-001. MOTION TO AMEND NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION BY CAUSE.* E-file #101275 submitted on 8/29/2016.* * 1.Other: This filing is rejected pursuant to ALJ Roscows e-mail dated 10/19/2016.* * Thank you. George Lau, Docket Office. Tel: (415) 703-4722. Dated: 10/20/2016

A1509001	Motion	8/25/2016 14:47	0.96	<div><div></div><div>REJECTED at 08/25/16 02:47 PM</div></div>	A1509001 - CAUSE - Motion to Amend NOI (160816)(PDF-A)-2.pdf - Motion (199 A1509001 - CAUSE - Motion to Amend NOI - CoS (PDF-A)-2.pdf - Certificate Of ... A1509001 - CAUSE - NOI attachment (Bylaws) (PDF-A)-2.pdf - Attachment (183 ... A1509001 - CAUSE - NOI attachment - IRS letter (PDF-A)-2.pdf - Attachment (2...	RE: MOTION TO AMEND NOTICE OF INTENT TO FILE INTERVENOR COMPENSATION, originally submitted 08/10/16 and resubmitted 08/24/16 in A15-09-001* 1. Document is not PDF/A compliant as required by Resolution ALJ-188: the main document and both attachments in support of the motion contain PDF/A fatal errors. The certificate of service is PDF/A-compliant.* 2. Please make the corrections and re-file the document(s) as soon as you are able. If the document deficiencies are cured within seven days, the document will be filed as of the original date it was tendered for filing (Rule 1.14(d)).* 3. When you re-file, check the box on Tab 1 labeled Resubmission, and enter the receipt number of the original filing that was rejected. If your filing has been rejected multiple times, list all receipt numbers in Tab 5 in the box for Filer Notes.* 4. When you re-submit the document(s), do not change any dates on the document(s).* Please, contact me if you have questions.* Maria Vengerova, legal analyst
A1509001	Motion	10/20/2016 9:18	19.68	<div><div></div><div>REJECTED at 10/20/16 09:18 AM</div></div>	A1509001 - CAUSE - Motion to Amend NOI with exhibits (WORD 16).pdf - Moti... a1509001 - CAUSE - Motion to Amend NOI - CoS.pdf - Certificate Of Service (3... A1509001 - CAUSE - Motion to Amend NOI (160810)(A).pdf - Attachment (983 KB	MOTION TO AMEND NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION BY CAUSE.* E-file #102197 submitted on 9/30/2016.* * 1.Other: This filing is rejected pursuant to ALJ Roscows e-mail dated 10/19/2016.* * Thank you. George Lau
A1509001	Comments	8/24/2016 10:20	5.39	<div><div></div><div>REJECTED at 08/24/16 10:20 AM</div></div>	A15-09-001 CAUSE separate comments on disputed issues.pdf - Comments (1... A15-09-001 Certificate Of Service and Service List.pdf - Certificate Of Service... A1509001 CAUSE-Guzman Aceves + Randolph- 3-Day Notice of Ex Parte.pdf -... A1509001COS CAUSE-Guzman Aceves 3-day ex parte notice.pdf - Certificate ...	Rejected pursuant to the Email message from the undersigned, dated August 24, 2016, which message is incorporated by reference herein as though set forth in haec verba.* MARTIN NAKAHARA To: Scott Rafferty, Esq. [for Collaborative Approaches to Utility Safety Enforcement – CAUSE]* * Pursuant to the provisions of Rule 1.14(c)(2), this is the prior Courtesy Notice of the Docket Office of the California Public Utilities Commission of our intention to reject and to return, unfiled, the referenced document(s) tendered for filing as Efile Control #100984 on 8/19/2016 for the following reason(s), to wit:• CAUSE joined TURN in the Comments submitted jointly entitled: “OPENING COMMENTS OF [TURN] and [CAUSE] TO UTILITY SAFETY ENFORCEMENT ON THE “CONTESTED ISSUES” IDENTIFIED IN THE PROPOSED SETTLEMENT,” timely submitted on 8/18/2016 (Efile Control #100977). • CAUSE then submitted on its own accord its “SEPARATE OPENING COMMENTS OF COLLABORATIVE APPROACHES TO UTILITY SAFETY ENFORCEMENT ON THE “CONTESED ISSUES” IDENTIFIED IN THE PROPOSED SETTLEMENT,” which was dated 8/18/2016, but not submitted until 8/19/2016 which served to render the comments untimely, among other things. The Opening paragraph thereof confirms these are “ ... additional comments. These comments are filed after the close of business in order to avoid duplicating comments CAUSE filed jointly with The Utility Reform Network. (footnote omitted)”* * Rule 12.2 provides the parties with the ability to file Comments and Reply Comments” . . . contesting all or part of the Settlement.” It does not confer upon any party the right to file Comments twice, first, with another party and then, individually,
A1509001	Exparte			<div><div></div><div>IN QUEUE (43 days)</div></div>	A1601009 Notice of Intent by CAUSE.pdf - Noi Filed (1 MB) 1609001 - CAUSE NOI - COS.pdf - Certificate Of Service (591 KB)	NO ACCEPTANCE OR REJECTION
A.1609001	Notice	11/28/2016	0.01	<div><div></div><div>CEPTED at 11/28/16 04:59 PM</div></div>	A1609001 CAUSE - Motion to Reconsider + Find Eligible for Intvnr Comp (170... A1609001 CAUSE - Motion + Amended NOI (170413) CoS PDFA compliance.p.. A1609001 CAUSE Amended NOI by CAUSE (170413).pdf - Noi Filed (1 MB) A1609001 CAUSE - Motion + Amended NOI (170413) CoS PDFA complianceA1609001 CAUSE Amended NOI (170413) Att 2 (Bylaws).pdf - Attachment (379 ... A1609001 CAUSE NOI amended (170413) - Att 3 (Motion to Reconsider).pdf - A... A1609001 CAUSE Amended NOI (170412) Att 4 (UA-100).pdf - Attachment (433 ... A1609001 CAUSE amended NOI (170413) Att 5 (EIN).pdf - Attachment (186 KB) Motion + Amended NOI (170413) CoS PDFA complianceA1609001 CAUSE Amended NOI (170413) Att 2 (Bylaws).pdf - Attachment (379 ... A1609001 CAUSE NOI amended (170413) - Att 3 (Motion to Reconsider).pdf - A... A1609001 CAUSE Amended NOI (170412) Att 4 (UA-100).pdf - Attachment (433 ... A1609001 CAUSE amended NOI (170413) Att 5 (EIN).pdf - Attachment (186 KB)	
A1609001	Noi Filed			<div><div></div><div>IN QUEUE (20 days)</div></div>	A1609001 Motion for Party status by CAUSE SCE (corrected).pdf - Motion (532... A1609001 - CAUSE Party Status - COS.pdf - Certificate Of Service (591 KB)	
A.1609001	Motion	11/28/2016	-2.63	<div><div></div><div>ACCEPTED at 11/28/16 04:59 PM</div></div>		
A1609001	Motion	11/29/2016 15:08	0.94	<div><div></div><div>REJECTED at 11/29/16 03:08 PM</div></div>	A1609001 Motion for Party status by CAUSE.pdf - Motion (504 KB) A1609001 - CAUSE Party Status - COS.pdf - Certificate Of Service (591 KB)	ENFORCEMENT (CAUSE) in A.16-09-001* 1. On the title page, the CPUC seal in the upper right-hand corner needs to be removed.* 2. Proceeding caption is missing from the title page.* 3. The proceeding caption on page 1 is incorrect. The last sentence should state "Things, and to Reflect that Increase in Rates." ["the Reflect" is erroneously stated.]* 4. Please make the corrections and re-file the document(s) as soon as you are able. If the
A.1509001	Motion	2/25/2016	-14.03	<div><div></div><div>ACCEPTED at 02/25/16 04:59 PM</div></div>		
A.1509001	Notice	11/30/2015	-94.68	<div><div></div><div>ACCEPTED at 11/30/15 04:59 PM</div></div>		NEVER ACKNOWLEDGED [FROM ME to ALJ:] I realize that you told me not to send you the documents directly, but since you were on the service list, I wanted to explain an error that I realized almost immediately after transmitting.* As I understand the instructions, the NOI was to be resubmitted unchanged, but with a new certificate of service. I accidentally renamed the old certificate of service as the main document "A1509001 NOI by Cause" in transaction 95344, which was filed as the resubmission for 92409. So this filing is actually two certificates of service - one old, one new.* I just tried to correct this, but it would not accept another resubmission, so I filed the correct main document and the new CoS as transaction 95349.* You should have received service of the correction already, but I attach the two correct documents again.* I have been unable to reach Ms. Vengerova for guidance, but I hope you can forgive this oversight. Thank you 12/2/15 Good morning Mr. Rafferty,* * We received both e-flings yesterday..the NOI was filed under confirmation # 92409 and the Motion was filed under confirmation #92408. Once the filings have been reviewed, you will receive either an acceptance e-mail or a rejection e-mail.* * Please let me know if you have any further questions.* * Thank you,* * Shontá Bryant-Floy*
A.1509001	Motion	11/30/2015	0.03	<div><div></div><div>ACCEPTED at 11/30/15 04:59 PM</div></div>		

A1509001	Amendment	2/25/2016	0.26	REJECTED at 02/25/16 02:51 PM	Unavailable
					
A1509001	Noi Filed	2/25/2016	86.33	REJECTED at 02/25/16 04:31 PM	Unavailable
					
A1509001	Motion	3/3/16 5:06 PM	0.04	REJECTED at 03/03/16 05:06 PM	Unavailable
					
A1509001	Noi Filed	3/3/16 5:07 PM	0.05	REJECTED at 03/03/16 05:07 PM	Unavailable
A1509001	Noi Filed				Unavailable
A-15-09-001	Supporting Documents			RECEIVED	
A-15-09-001	Supporting Documents			RECEIVED	
A-16-09-	Supporting				

0000095084, received on 2/25/2016 has been rejected by the Clerk for the following reason:1. Please make the corrections and re-file the document(s) as soon as you are able. If the document deficiencies are cured within seven days, the document will be filed as of the original date it was tendered for filing (Rule 1.14(d)).2. When you re-file, check the box on Tab 1 labeled Resubmission, and enter the receipt number of the original filing that was rejected. If your filing has been rejected multiple times, list all receipt numbers in Tab 5 in the box for Filer Notes.3. When you re-submit the document(s), do not change any dates on the document(s).4. Please Re-serve the document(s) on the Service List with the recommended changes. The date of the document should remain the same, but the date on the Certificate of Service should reflect the date of re-service.5. Other: Please, see an email of February 25, 2016, from the intervenor compensation program coordinator (lcompcoordinator@cpuc.ca.gov). Please, let me know if you have questions.Maria Vengerova, legal analyst

0000092409, received on 11/30/2015 has been rejected by the Clerk for the following reason: 1. Please make the corrections and re-file the document(s) as soon as you are able. If the document deficiencies are cured within seven days, the document will be filed as of the original date it was tendered for filing (Rule 1.14(d)). 2. When you re-file, check the box on Tab 1 labeled Resubmission, and enter the receipt number of the original filing that was rejected. If your filing has been rejected multiple times, list all receipt numbers in Tab 5 in the box for Filer Notes.*3. When you re-submit the document(s), do not change any dates on the document(s).*4. Please Re-serve the document(s) on the Service List with the recommended changes. The date of the document should remain the same, but the date on the Certificate of Service should reflect the date of re-service.*5. Other: pursuant to your request of February 25, 2016, sent to the intervenor compensation coordinator at lcompcoordinator@cpuc.ca.gov*Please, let me know if you have questions.*Maria Vengerova

0000095346, received on 3/3/2016 has been rejected by the Clerk for the following reason:* * RE: MOTION FOR PARTY STATUS BY COLLABORATIVE APPROACHES TO* UTILITY SAFETY ENFORCEMENT (CAUSE)* 1. Document title is incorrect or incomplete: the title of this motion has to include the word "AMENDED." (Your e-mail to lcompcoordinator of February 24, 2016, actually, included a copy of the motion that had the word AMENDED in the title.)* 2. The date in the resubmitted document is incorrect (November 30, 2015). This document was originally submitted on or about February 25, 2016. Please provide a document with the original date of submission (on or about February 25, 2016).* 3. Please make the corrections and re-file the document(s) as soon as you are able. If the document deficiencies are cured within seven days, the document will be filed as of the original date it was tendered for filing (Rule 1.14(d)).* 4. When you re-file, check the box on Tab 1 labeled Resubmission, and enter the receipt number of the original filing that was rejected. If your filing has been rejected multiple times, list all receipt numbers in Tab 5 in the box for Filer Notes.* 5. When you re-submit the document(s), do not change any dates on the document(s) (it should be dated by the date on or about February 25, 2016). The Certificate of Service, however, has to reflect the date of March 3, 2016, when you re-served your document.* Please, let me know if you have questions.* Maria Vengerova, legal analyst

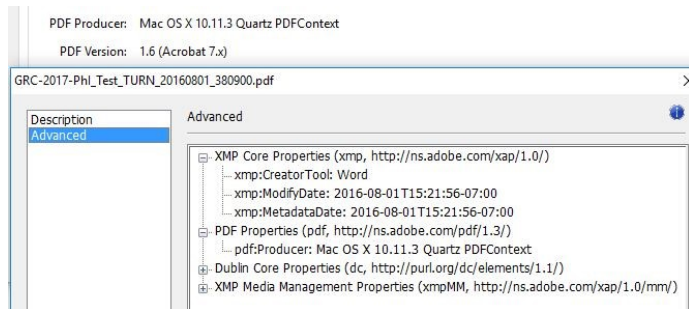
0000095344, received on 3/3/2016 has been rejected by the Clerk for the following reason:* 1. Other: rejected pursuant to Mr. Rafferty's e-mail of March 3, 2016, to the Intervenor Compensation Program Coordinator * If you have questions about this rejection, please contact the CPUC Docket Office at the address listed below. *Docket Office

001 Documents

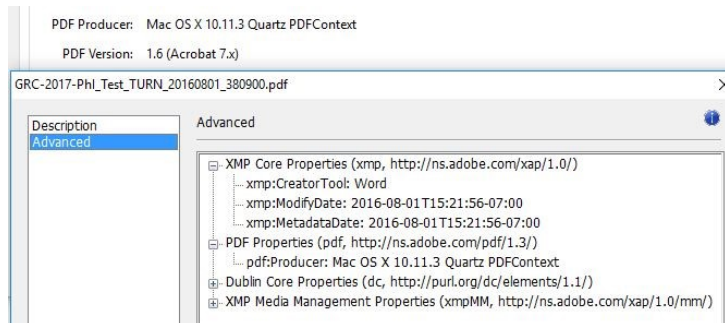
RECEIVED

ATTACHMENT 2. Advanced Metadata show PDF/A Status from Selected Documents

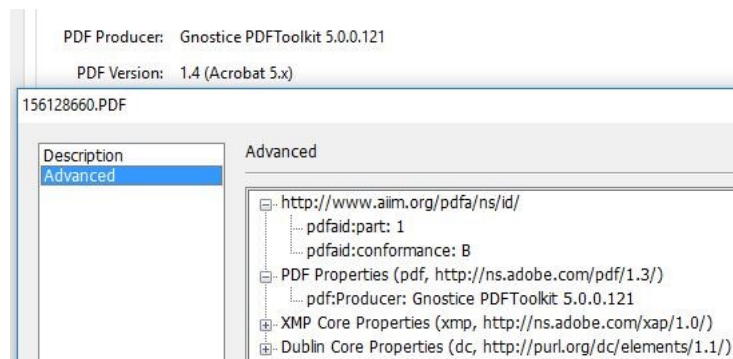
TURN Testimony PDF 1.6, not PDF/A



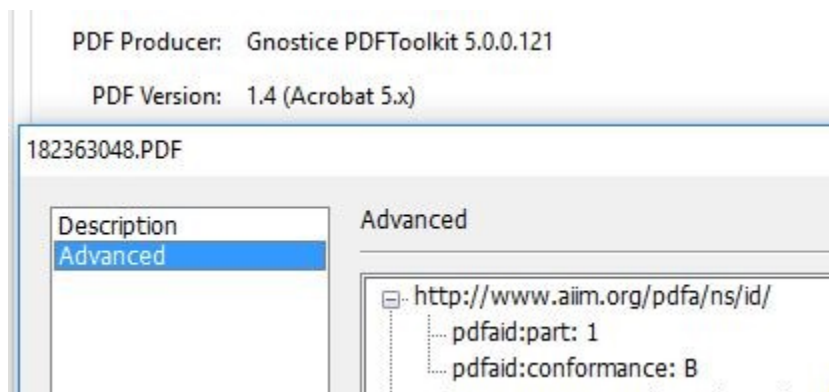
CUE Testimony PDF 1.6, but not PDF/A



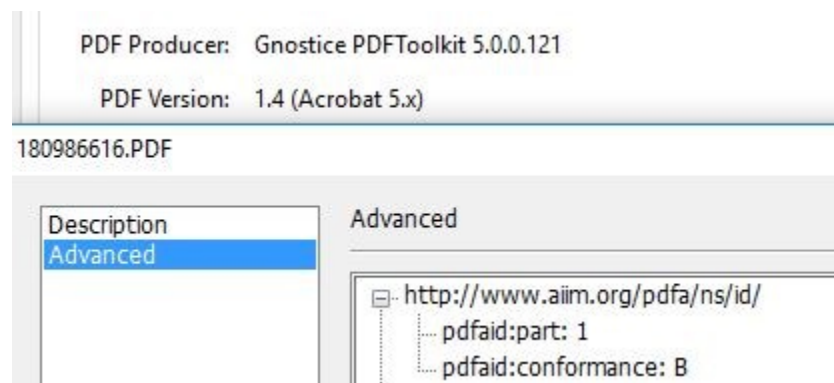
Scoping Memo PDF/A-1b:2005 non-ADA



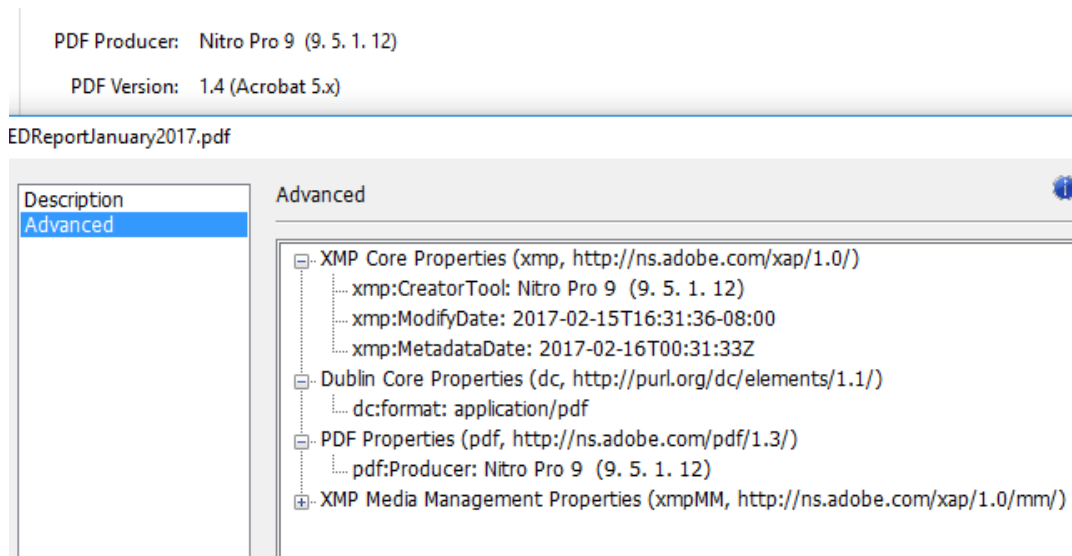
Proposed Decision PDF/A-1b:2005, non-ADA



ORA Comments, 3-20-17, PDF/A-1b:2005, non-ADA



SED Report, A.16-09-001, Jan. 2017, PDF 1.3, not PDF/A



ATTACHMENT 3. Letter to ALJ and President Picker.

SCOTT RAFFERTY, ESQ.
1913 WHITECLIFF COURT
WALNUT CREEK CA 94596
(202) 380-5525 RAFFERTY@GMAIL.COM

August 29, 2016

The Hon. Michael J. Picker
 The Hon. Steven Roscow
 California Public Utilities Commission
 505 Van Ness Avenue
 San Francisco CA

Re: A-15.09.001 – Rejection of Documents Filed by CAUSE

Dear President Picker and Judge Roscow:

For the third time, I am attempting to file my Notice of Intent to Claim Intervenor Compensation in a manner that the docket office will recognize as complying with PDF/A. I sincerely believe that both prior versions also complied with the format, as standardized by ISO 19005-1 (2011) and ISO/DIS 32000-2.4 (July 2016). I apologize if there is any error on my part, but I would not make this statement without having done hours of research in my attempt to determine possible causes for the difficulty that the docket office has had in recognizing my submissions. Without more information, I simply cannot understand the obstacle they have imposed.

I take this matter extremely seriously. Since the repeated rejection notices are being widely distributed, my credibility and professionalism are now at stake, particularly given my past work in document preservation. I participated in what I believe to be the first ratemaking proceeding that used electronic discovery, more than 25 years ago, and studied the sustainability of electronic document formats while in federal service. On each occasion, I wanted to have the best possible understanding of the problem encountered by the docketing office before I made yet another attempt to file. Furthermore, I understand from Judge Roscow that he intends to grant my Notice of Intent, provided that I resolve its technical rejection by the docketing office. Therefore, my continued inability to persuade the docket office of conformity places me in serious financial jeopardy. It even casts a cloud over my client's ability to place material in the docket of this case.

I want to thank Ms. Vengerova for her efforts to assist me. However, I have left both telephone and email messages for the docketing office, neither of which has been returned. Therefore, I have no choice but to attempt once again without having any understanding of what the docketing office expects.

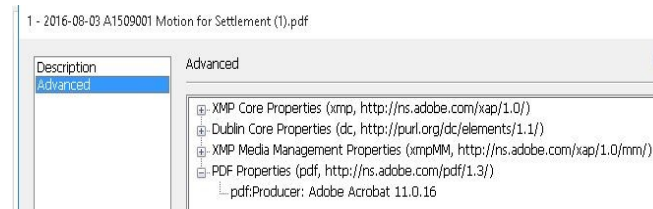
One might reasonably ask (as I did) why this problem is only happening to me. I can only conclude that the docket office is not verifying the compliance of every document being filed in this case. For example, several documents recently filed by PG&E, including the settlement document itself, do not comply with PDF/A. A compliant document, such as my motion (A1509001 – CAUSE- Motion to Amend NOI) displays “PDF/A ID” part and compliance (level) in the fifth element of its “advanced additional metadata.” As the comparison shows, the

settlement document does not show that it meets the standard. Each of the other PG&E filings that I inspected also failed to show compliance. *e.g.*, GRC-2017-PhI_DR_ED_Oraloo8-Qo6Atcho1.pdf, and Summary of PGE

2017 GRC Settlement.pdf

Please consider the following proofs of

- At this point, I have submitted one (whose module Adobe PDF-Maker 15 seems to be preferred for court filings) and one created by Adobe Acrobat Pro DC.
- I am using the latest version of each program, specifically Adobe Pro DC v. 2015.017.20053, released August 2, 2016, and Word 365 v.16.0.7070.2033, released July 26, 2016.
- I have verified compliance of each version using two processes (preflight and advanced metadata review) provided by Adobe, the pre-eminent licenser of PDF-compliant software. I provide screenshots of the verifications for each of the documents filed on August 16, 2016, showing compliance with part 2 at conformance level b.
Exh. A – Adobe preflight verification – Motion to Amend NOI
Exh. B – same – NOI
Exh. C – same – Bylaws
Exh. D – same – IRS letter
- I have attempted different conformance levels, first using the original PDF/A-1a, the standard for which has not been updated since October 2010, and then using the PDF/A-2b, which is fully compliant with revisions to ISO/DIS 32000-2.4 made in July 2016. My software is capable of preparing documents at any of the standard's eight conformance levels, although some of these may not be fully compatible with earlier versions of Adobe Acrobat, up to Acrobat 7.0, released in 2005.
Exh. E – verification screenshot – August 10 motion (PDF/A-1a).
- I have successfully verified PDF/A compliance on multiple machines. In order to determine whether there could be any corruption as a result of transmission, I have sent the files via email, downloaded them on a different machine, and then confirmed their compliance. Ms. Vengerova generously transmitted back a copy of a rejected file, so that I could confirm that it was compliant when received by the Commission.



compliance:

version created by MS-Word

- I have confirmed that my documents do not contain those elements prohibited by PDF/A that most frequently cause documents to fail verification, such as non-embedded fonts or JavaScript. There are no attachments or transparency, even though these are permitted under parts 2 and 3 of the standard. The documents provide device-independent color information, one of the essential elements for PDF/A compliance, and were prepared for the viewing condition of sRGB.

The limited written explanation provided by the docket office refers to a “fatal error,” a term which has a uniform definition: a software event that causes a program to terminate.¹⁷ A “fatal error” is not a property of a document, as the docket office suggests. Of course, attempting to read a corrupt document might cause such an event, at least as to certain software. But I have successfully read and verified compliance on multiple machines, so the document does not cause all programs on all machines to terminate. Of course, I cannot exclude the possibility that limitations on the software or hardware used make the docket office incapable of accepting certain documents even though other machines have no problems. To cite an obvious example, a complex document might cause software on a machine with very limited memory or a very slow processor to have a fatal error. It is not inconceivable that their system is vulnerable to a very particular characteristic that is found in my document, but which they have not identified. Such a fatal error may also be intermittent, but it will always be subject to some diagnosis because the operating system creates a log entry or core dump. They may have encountered “fatal errors” that prevented their particular program from reading my document on a specific machine (and caused their program to terminate). It does not follow that my documents have not complied with the PDF/A standard.

It is not also the case that scanned documents do violate PDF/A, even if they do not contain a layer containing optically recognized text. Images, including whole-page images, are acceptable (and often necessary to preserve the authentic appearance of an exhibit produced by a third-party). But this also should not be an issue, because my documents were natively prepared in MS Word or in the text mode of Adobe Acrobat.¹⁸

¹⁷https://en.wikipedia.org/wiki/Fatal_exception_error, http://www.webopedia.com/TERM/F/fatal_error.html, <http://encyclopedia2.thefreedictionary.com/fatal+error>, <http://www.pcmag.com/encyclopedia/term/43025/fatal-error> (PDF/A conversion eliminates the live links produced by Acrobat.

¹⁸ Even though it is not an element of PDF/A compliance, I have created a text-version of the attachment presented a letter from the Internal Revenue Service. Exhibit

I cannot manually confirm absolute compliance with every element the international PDF/A standards (which alone exceed 1000 pages and costs hundreds of dollars to obtain the right to review) or with the subsidiary standards. Perhaps, it is possible that the software or technique that the docket office employs to test PDF/A compliance considers a detailed requirement that Adobe itself does not meet when it prepares and verifies documents as PDF/A-compliant. This seems extremely unlikely.

Finally, it is possible that the docketing office itself unintentionally applies some process that changes the document, eliminating PDF/A-compliance. The PDF/A format cannot be encrypted or even protected from change. Therefore, it is vulnerable to any action (such as timestamping) that alters the data, format, or metadata of a document. This destroys PDF/A compliance (unless, of course, there is a specific reconversion of the document to the PDF/A standard.

CONCLUSION:

I refile these documents with reluctance. I still have no idea what the docket office requires. Without having some clearer explanation from them, I have no reason to believe that the attached documents will be any more acceptable than my prior attempts. I ask that you understand this predicament, and I commit to take whatever further steps that you may deem necessary to resolve it. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Scott Rafferty". The signature is written in a cursive, slightly slanted style.

Scott J. Rafferty

SCREENSHOTS

Exh. A – Conformance of Motion to Amend NOI verified

This file claims: compliance with the PDF/A standard and has been opened read-only to prevent modification.

Standards

Conformance

Standard: PDF/A-2B
ISO Name: ISO 19005-2


Status: **verification succeeded**

[Verify Conformance...](#)

OutputIntent

Identifier: Custom
Info: sRGB IEC61966-2.1

[Open Preflight](#)



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2017 (U39M)	Application 15-09-001 (Filed September 1, 2015)
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MOTION TO AMEND NOTICE OF INTENT TO CLAIM INTERCOMPENSATION

Exh B – Conformance of NOI verified

This file claims compliance with the PDF/A standard and has been opened read-only to prevent modification.

Standards
Conformance
Standard: PDF/A-2B
ISO Name: ISO 19005-2
Status: verification succeeded
[Verify Conformance...](#)
OutputIntent
Identifier: Custom
Info: sRGB IEC61966-2.1
[Open Preflight](#)

Revised September 2014

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2017	Application 15-09-001 (Filed September 1, 2015)
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[AMENDED]

NOTICE OF INTENT TO CLAIM INTERVENOR COMPENSATION AND, IF REQUESTED (and [redacted] checked), ADMINISTRATIVE LAW JUDICIAL RULING ON [Intervenor's Name]'S SHOWING OF SIGNIFICANT FINANCIAL INTEREST

Exh C – Conformance of Attachment (Bylaws) verified

This file claims compliance with the PDF/A standard and has been opened read-only to prevent modification.

Standards
Conformance
Standard: PDF/A-2B
ISO Name: ISO 19005-2
Status: verification succeeded
[Verify Conformance...](#)
OutputIntent
Identifier: Custom
Info: sRGB IEC61966-2.1

BYLAWS OF COLLECTIVE APPROACHES TO UTILITY SAFETY ENFORCEMENT





A CALIFORNIA UNINCORPORATED ASSOCIATION

Section 1.

The name of the organization shall be Coll. Approaches to Utility Safety Enforcement,

Att D – Conformance of IRS letter verified

 This file claims compliance with the PDF/A standard and has been opened read-only to prevent modification.



Standards

Conformance


Standard: PDF/A-2B
ISO Name: ISO 19005-2

Status: **verification succeeded**

[Verify Conformance...](#)

OutputIntent

Identifier: Custom
Info: sRGB IEC61966-2.1

 DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
CINCINNATI OH 45999-0023

SCOTT RAFFERTY