

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of Ohio	)	
Adm.Code Chapter 4901-1 Rules	)	
Regarding Practice and Procedure Before	)	Case No. 18-275-AU-ORD
the Commission.	)	

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**INITIAL COMMENTS OF INTERSTATE GAS SUPPLY, INC.**

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**I. INTRODUCTION**

On December 4, 2019, the Commission issued amended rules for comment, including those in Ohio Adm.Code 4901-1 which govern practice and procedure before the Commission. Interstate Gas Supply, Inc. (“IGS” or “IGS Energy”) appreciates the opportunity to provide comments on these rules.

**II. COMMENTS**

**A. E-Filing Requirements in Ohio Adm.Code 4901-1-02 & 4901-1-03**

In one of these sections, IGS proposes the addition of a requirement that all type-written, electronically filed documents must have the capability to electronically search the text within the document.

Ohio Adm.Code 4901-1-02(D)(1) of this rule requires that all filings comply with the electronic filing manual and technical requirements (“Manual”) located on the Commission’s website. Although the Manual recognizes the benefits of searchable documents and states that available source files should be included for this purpose in Sections 1.08 and 5.04, IGS notes that not all stakeholders file either searchable documents or the available source file(s). Thus, IGS suggests incorporating a more specific requirement within these rules.

This small addition will provide great benefits to all stakeholders, including the Commission, when reviewing the dockets. Filings before the Commission can reach hundreds of pages of content, which makes reviewing them without this function quite tedious. Ensuring this capability will make this process more efficient while creating only a limited burden, as many parties already file documents with this search function. Additionally, this may enhance the “Full Text Search” by “Document Content” function on the Commission’s Docketing Information System webpage. Therefore, IGS respectfully requests this addition.

**B. Service in Ohio Adm.Code 4901-1-03 and 4901-1-05**

In Ohio Adm.Code 4901-1-05(D), the Commission proposed the following addition: “Unless service is completed through the commission’s e-filing system as set forth in paragraph (B) of this rule or email service is impractical, an attorney representing a party before the commission shall accomplish service upon other attorney-represented parties by email.” IGS believes this addition establishes service by email as the default method for any party represented by an attorney in a Commission proceeding and fully supports the provision.

In light of this change, IGS would like to recommend an additional revision to the rules. IGS notes that Ohio Adm.Code 4901-1-03(A) instructs an attorney or party willing to accept service of filed documents by email to include a statement indicating this within its pleadings. Because IGS believes the proposed rules will now assume that all parties represented by an attorney are willing to accept service of filed documents by email, IGS recommends the following revisions:

Ohio Adm.Code 4901-1-03(A): ... Such pleadings or other papers shall also contain the name, address, and telephone number of the person filing the paper, or the name, address, telephone number, email address, and attorney registration number of his or her attorney, if such person is represented by counsel. ~~The party making a filing should include a fax number and/or an e-mail address if the party is willing to accept service of pleadings by fax or e-mail.~~ An attorney or party not represented by an attorney who is willing to accept service of filed documents by fax shall include a fax number and the following phrase next to or below its fax number: (willing to accept service by fax). An ~~attorney or~~ party not represented by an attorney who is willing to accept service of filed documents by e-mail shall include an email address and the following phrase next to or below its e-mail address: (willing to accept service by e-mail).

Additionally, IGS hopes that by establishing email as the default service method, the mailing of Commission Entries and Orders to those parties represented by an attorney will be eliminated. However, should this not be the case, IGS recommends this should be eliminated from the Commission's process. Parties subscribed to the case receive notification of and access to these decisions as soon as they are uploaded to DIS. This makes mailing these unnecessary and removing this step could produce savings to the Commission in time and postage. Therefore, IGS recommends the adoption of these changes.

### **C. CONCLUSION**

For the foregoing reasons, IGS recommends that the Commission adopts IGS' recommendations regarding the proposed rules of Ohio Adm.Code Chapter 4901-1.

Respectfully submitted,

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Summary: Comments Initial Comments of Interstate Gas Supply, Inc. electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc.