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RUL-U-08-01

Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**NOTICE OF RULEMAKING REGARDING THE )  
COMMISSION'S RULES OF PROCEDURE, )  
IDAPA 31.01.01.000 ET SEQ. )**

**DOCKET NO. 31-0101-0801**

**STAFF COMMENTS**

COMES NOW the Staff of the Idaho Public Utilities Commission by and through its attorney of record, Donald L. Howell, II, and hereby submits these comments in support of the Commission's proposed changes to its Procedural Rules. Staff notes that it has been approximately five years since the Commission last updated its Rules of Procedure. The Staff believes that the proposed changes contained in the Commission's Notice of Rulemaking improve readability, eliminate ambiguities, and make other necessary changes. In addition, Staff believes that the increased use of electronic filing and allowing documents to be printed on both sides of the page will save both time and resources for those parties filing documents with the Commission.

**STAFF PROPOSED ADDITIONS**

The Commission Secretary recommends that the Commission consider two additional changes to Rules 61 and 62. More specifically, to the assist the Commission Secretary in copying and distributing documents within the Commission, she has asked that original documents be filed "unbound and unstapled." Requiring that original document be unbound and unstapled will appreciably aid in the scanning, copying and distribution of original documents.

To implement the Commission Secretary's suggestion, Staff requests that the Commission consider the following additional changes to its proposed amendments to Rule 61 and 62. The Secretary's proposed changes are shown in bold italicized text.

**061. FILING DOCUMENTS WITH THE COMMISSION -- NUMBER OF COPIES -- DISCOVERY -- FACSIMILE TRANSMISSION (FAX) AND ELECTRONIC FILING (RULE 61).**

The following numbers of documents ~~must~~ shall be filed with the Commission Secretary:

- (7-1-93)( )
- 01. Printed Filings.** When filing printed material, (4-5-00)( )
- a.** In utilities cases (other than those cases specified in Subsections 061.01.b. and 061.01.c. below of this rule): (3-16-04)( )
- i.** Pleadings (applications, petitions, complaints, motions, answers and consent agreements)--an original (unbound and unstapled) and seven (7) copies. (7-1-93)( )
- ii.** Briefs, proposed orders, statements of position, and exceptions under Rule 312—an original (unbound and unstapled) and eight seven (87) copies. (4-5-00)( )
- b.** Security issuance cases: (4-5-00)
- i.** Pleadings--an original (unbound and unstapled) and four (4) copies.(7-1-93)( )
- c.** Telecommunication interconnection agreements: (3-16-04)
- i.** Pleadings--an original (unbound and unstapled) and three (3) copies.(3-16-04)( )

[No other changes to Subsections 02, 03 and 04.]

**062. FORM OF DOCUMENTS (RULE 62).**

...

**04. Original Documents. All original documents filed with the Commission Secretary shall be unbound and unstapled. Copies of original documents may be bound or stapled.** ( )

Respectfully submitted this 22<sup>nd</sup> day of October 2008.

A handwritten signature in black ink, appearing to read "Donald L. Howell, II", written over a horizontal line.

Donald L. Howell, II  
Deputy Attorney General

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