

The following draft instructions are for the purpose of discussion at the August 22, 2007 Technical Conference and for comments that may be filed in the Docket No. RM07-16-000 proceeding. The actual organizational format of the final instructions issued by the Secretary will be different. The organizational format will be modified to reflect the context in which the user seeks the information. For example, only Part 157 gas certificate file and document format instructions will appear at web pages focused on Part 157 filings.

1. **Instructions for Electronic Filing Submission**

1.1 ***Preparation of Filing Electronic Documents***

1. The Commission's regulations establish the filing requirements for filings made through the Commission's eFiling website. The filing regulations establish the minimal requirements by filing type, and identify the required and optional supporting documentation. To the extent there is any perceived inconsistency between the Commission's filing regulations and these instructions, the regulations control. Further, some filing types require specific document file formats and specific electronic document formats. Those specific file and document format requirements are not superseded by these instructions.
2. No tariff filing under Parts 35, 154, 284.123, 300 or 341 can be filed through eFiling.

1.1.1 **Electronic Document File Format Conventions**

3.

(a) **Electronic File Format Conventions**

4. For those regulatory programs and filing types for which there are not specific document file format requirements, applicants should abide by the following guidelines:
 - A. Text files must be saved and filed in native format (if on the Commission's list of acceptable file formats¹), ASCII format, or Portable Document Format (PDF) format as discussed below. Those documents filed in native format must be accompanied with a PDF or ASCII formatted text rendition.
 - B. If the Commission's filing requirement requires a table of contents for the document, then the submitted file format should support and utilize the hyperlink function.
 - C. Spreadsheets must be filed in native application and accompanied with a PDF, ASCII or tab delimited formatted document.

¹ The list of acceptable electronic file formats is available at <http://www.ferc.gov/help/submission-guide/electronic-media/acceptable.asp>.

D. Files other than spreadsheets must be saved in the format of the software used to create the file (native format) if on the Commission's list of acceptable file formats, in flat ASCII files, or in PDF format, and native formatted documents must be accompanied by an ASCII or PDF copy.

E. PDF: The following standards apply to filers using PDF.

- a. PDF documents *must* be text searchable to the extent practicable. This is particularly the case where the filer created the original document. Text searchable PDFs are created utilizing the print-to-pdf function for all documents created in electronic format.
- b. Scanned text and graphic PDF documents are permitted only for documents that do not exist in an electronic format, such as copies of old documents, or where, for some other reason, the filing of a text-searchable PDF document is impractical.
- c. Text documents with tables of contents should use the "bookmark" feature of the PDF creator.
- d. If a single PDF document is composed of multiple PDF parts, use the "Attachment" feature of the PDF creator. Do not use the "Link Tool" to link separate documents.
- e. PDF conversions of Computer Aided Design (CAD) files or other formats with multiple layers *must* utilize the layer conversion feature of the PDF converter.
- f. Do not include any scripts in PDF files.

(b) File Naming Conventions

5. Every electronic filing that contains multiple electronic documents *must* have one electronic file titled "**Transmittal Letter,**" with either a native file or PDF extension, that is classified "Public."
6. If the applicant utilizes more than eight characters before the extension, use a filename that conforms to the name given the statement, schedule, or workpaper, and does not conflict with other names of files to be attached to the tariff filing. Deviation from the strict naming convention is acceptable when material does not fit within the definitions of the statements/schedules but is related to one of them. File names should not be longer than 60 characters total, including the dot and the extension.
7. The file extension should indicate the format of the file. Files submitted in the proprietary format of the software used to create the file must contain the extension commonly associated with the software. For example, a file created in EXCEL would have a file extension of XLS. A text file created in WORD would have the file extension DOC.
8. If the applicant chooses to limit file names to eight characters plus a three character extension, utilize the following:

1st character	S for statement or C for schedule
2 nd through 5th characters	statement or schedule name (with no dashes, parentheses, or periods) followed by an underscore to separate the statement or schedule name from the page numbers -- See Appendix A for abbreviations for statement and schedule names applicable to the gas program. The gas convention may be used by the other programs.
6th through 8th characters (Optional)	page or part number (i.e., _01) -- if the pages or parts exceed 99, eliminate the underscore and use all three spaces for values greater than 99. Enter values in these spaces to subdivide statements or schedules into separate files, if necessary.
Extension	Enter a three character extension to denote the type of filing as noted above.

9. It is occasionally necessary to refile all or a portion of a document in a docket. This type of refile occurs, for example, when a company files to update its statements in compliance with a Commission order, to amend its proposal, or to correct mistakes in the original filing. The refiled document names must include a consistent increment designator to distinguish between the different files. The increment term may be a date (e.g.: May 11, 2008) or revision (e.g.: “Rev 2” or “v 2”).
10. The applicant may include material in its filing that does not fit within the definitions of the statements and schedules listed in the Commission’s regulations. In that case, the applicant must label the additional material as a statement using a letter not already in use, for example, Statement CC. The format of the file depends on the content of the additional material. If the additional material consists of tabular material, the file must be tab-delimited or spreadsheet format. If the additional material is narrative text, the file should be in native format.

1.1.2 Electronic Document Format

11. Unless the regulations for the filing type or the supporting document otherwise require, electronic documents do not have to abide by standard paper sheet size, margin, or font requirements. Notwithstanding, applicants should take into account legibility, and electronic documents must conform with the electronic document format requirements of these instructions.

(a) Document Headers and Footers

12. Enter the following header information. Each item listed below must appear on a separate line.

ITEM	LOCATION
Docket Number, if known	Upper right hand corner

Statement or Schedule Identification	Upper right hand corner
Company Name	
Schedule Title	
Time Period the Data Cover or filing date (as appropriate)	

13. Do not include hard-keyed headers or footers in either tab-delimited or native format data files. Native format data files may include headers or footers as part of the print definition, print options or print macros of the software. The PDF rendition may include headers and footers on each page.
14. Enter the Docket Number if the filing is other than an original submission and the Commission has assigned a docket number to the case. The Statement or Schedule Identification must be consistent with the terms used in the Commission's regulations. The Company Name must be the full legal name of the company.
15. If the document contains material for which the company seeks confidential or privileged treatment, the phrase "Contains Privileged [or Confidential] Information -- Do Not Release" must appear in the header of every page or section that contains such material.

(b) Numeric Data and Workpapers Showing Calculations

16. Calculations required by regulations must be included in a spreadsheet's native format.
17. All spreadsheet or data base worksheets or tables with the same columnar headings should be saved together in a single file. A filer may save individual schedules or statements in separate files, provided links between data or cells are not broken or converted into values.
18. Spreadsheets may be filed with multiple "worksheets," and data bases may be filed with multiple tables. Links between data or cells between worksheets or fields and tables should not be broken or converted into values.
19. If a value or report in a spreadsheet or data base requires the use of a macro or script, include it as part of the electronic document. Print settings and definitions may be set as the filer chooses.
20. Spreadsheet or data base files' macros or scripts must not reference any source outside of the electronic file, including date or time. Macros and scripts *must not* be set to automatically run upon opening a file or other automatic trigger.
21. All numeric fields must adhere to the following conventions for coding data on the electronic filing:

- A. Numeric items do not require leading zeros, unless otherwise noted. Use a single "0" to report a zero value.
 - B. Indicate negative amounts with a "-" sign preceding the first nonzero digit reported or with parentheses encompassing the number. Do not use solely color to signify negative numbers.
 - C. Avoid using parentheses to enclose a number in a text field, such as in a column heading for column identification, (1), (2), (3), etc.
 - D. Do not include units (Dth) in reporting any numeric value. Include units in the title, in a column designated for that purpose, in the row description, or column heading as demonstrated in the section entitled "Templates Applicable to Specific Statements and Schedules." It is preferable to exclude quotation marks (") when reporting data, unless they are necessary under the rules of grammar.
 - E. For data filed in a tab-delimited format, do not use commas or units (\$, Dth) when reporting any numeric value.
22. For ASCII data, whether delimited or not, the applicant must use the standard ASCII character set. There are a few symbols that are commonly available in commercial software that are not included in the standard ASCII character set, and these symbols should be avoided. A few are listed below:

Character	Description
¢	cent
·	bullet
¶	paragraph
§	section
©	copyright
®	registered trademark
TM	trademark
½,¼	Common fractions

23. Where necessary, filers should spell out the name of the symbol they would otherwise use.

24. When saving a file into ASCII representation, be aware that all special coding will be lost. Shading, underlining, bolding, and other formatting characteristics are lost in the transition. Prepare your files with this in mind.

(c) **Graphics**

25. If the text or spreadsheet document contains limited graphics, the graphic file may be embedded in native format. If saving a graphic within a text or spreadsheet document causes problems, consider making the graphic an appendix or an attachment in a separate electronic document file.

(d) **Video and Animated Graphics**

26. Video and animated graphics should be filed as separate electronic documents. They should not be embedded in text, spreadsheet or data files.

(e) **Audio**

27. Audio should be filed as separate electronic documents.

1.2 Accessibility and Security

28. Electronic documents filed with the Commission:

- a. *must not* be password protected at any level (document, worksheet, table, graphic, cell, etc.). Files may be made “read only,” however they *must not* be copy protected;
- b. *must not* be encrypted;
- c. *must not* contain hidden data or references;
- d. *must not* contain viruses, spy ware, links or calls of any type external to the document, or macros and scripts that link, call or effect anything outside of the document;
- e. *must not* contain any macro or script that invokes or creates any of the items (a) through (d), or otherwise alter the electronic file in a manner that renders the file unreadable to the user.

2. Parts 153, 156 and 157 Filings

29. This section identifies specific electronic file format requirements for specific required documents set forth in Parts 153, 156 and 157 filings. To the extent an Exhibit or document is not identified, follow the generally applicable instructions.

Document	Electronic file format
Exhibit A – Articles of Incorporation	PDF – scanned acceptable
Exhibit B – State and local authorizations	PDF – scanned acceptable
Exhibits G and G-I	Data sets: Data. Diagram: The PDF conversion with layers if the native file is a CAD program or other program that generates layers. Searchable PDF for conversions from other software formats.
Exhibit I – Market Data	Customer, contract, volume and revenue data should use the file and document formats prescribed by Part 154’s <i>Instruction Manual for Electronic Filing of the Rate Filings</i> , Statement G.
Exhibit K	Spreadsheet
Exhibit L – Cash flow, balance sheets, income statements and comparative studies of the same	Spreadsheet
Exhibit N	Depending on the presentation, either spreadsheet or the file and document formats prescribed by Part 154’s <i>Instruction Manual for Electronic Filing of the Rate Filings</i> .
Exhibit O	Spreadsheet
Exhibit P	Text
Exhibit Q	Spreadsheet or the file and document formats prescribed by Part 154’s <i>Instruction Manual for Electronic Filing of the Rate Filings</i> for rate filing statements.

Exhibit S	Spreadsheet
Exhibit V	Data sets: Data. Diagram: The PDF conversion with layers if the native file is a CAD program or other program that generates layers. Searchable PDF for conversions from other software formats.
Exhibit Y	Spreadsheet
Exhibit Z	PDF conversion
Any map or diagram not otherwise identified in any of the above exhibits	Data sets: Data. Diagram or maps: The PDF conversion with layers if the native file is a CAD program or other program that generates layers. Searchable PDF for conversions from other software formats.

3. Parts 4, 5, 6, 8, 9, 12 and 16 – Licenses, Permits, Exemptions

30. Filings made pursuant to Parts 4, 5, 6, 8, 9, 12 and 16 should follow the requirements of the generally applicable instructions, unless otherwise specified in the regulations (for example, GIS maps).

4. Part 39 – Electric Reliability Organizations

31. This section identifies electronic file format requirements for specific documents in Part 39 filings that must be followed in addition to the generally applicable rules. For an item that is not identified, follow the generally applicable instructions.

Document	Electronic file format
Exhibits – Data and Spreadsheet	Data and Spreadsheets may be filed using the generally applicable rules for (c) <i>Numeric Data and Workpapers Showing Calculations</i> or Filer must use the following electronic file format. If the exhibit is in tabular form, use a tab-delimited or spreadsheet electronic file format. If the spreadsheet is embedded in a PDF file, also submit the spreadsheet as a separate exhibit in native file format.
MUST and Power Flow Program	<p>Acceptable file formats include:</p> <p>Managing and Utilizing System Transmission (MUST) Software</p> <p>.CON</p> <p>.MON</p> <p>.SUB</p> <p>.TRA</p> <p>PTI, PSS/E Power Flow Program Raw Data file format</p> <p>.RAW</p> <p>In addition to the exhibit, filers must provide a PDF version of proprietary format files.</p>
Diagrams and Maps	Filer must use the following electronic file format. The PDF conversion with layers if the native file is a CAD program or other program that generates layers. Searchable PDF for conversions from other software formats.
Form 715 – If filed electronically, these additional file Format requirements apply.	<p>Form No. 715, Part 2</p> <p>In addition to ASCII, the filer may use any of the file formats provided in the <i>Instructions for Completing the FERC Form No. 715 Annual Transmission Planning and Evaluation Report</i>.</p> <p>In addition to the exhibit, filers must provide a PDF version of proprietary format files.</p> <p>Form No. 715, Part 3</p> <p>The PDF conversion with layers if the native file is a CAD program or</p>

	other program that generates layers. Searchable PDF for conversions from other software formats.
Simultaneous Transmission Impact Limit Studies (SIL)	<p>If the exhibit is mainly text it should be in native file format and should be PDF – scanned material is only acceptable as provided for in the general instructions.</p> <p>If the exhibit is in tabular form, it should be in tab-delimited or spreadsheet electronic format as provided for in the general instructions.</p> <p>Acceptable file formats include:</p> <p>ASCII Comma Separated Value</p> <p>.CSV</p> <p>Spreadsheet</p>

5. Part 50 – Permits to Site Interstate Electric Transmission Facilities

32. Filings made pursuant to Part 50 should follow the requirements of the generally applicable instructions.

6. Parts 35, 154, 284, 300 and 341 – Tariff filings

33. Tariff filings made pursuant to Parts 35, 154, 284 and 341 cannot be made through eFiling. eFiling 7.0 cannot distinguish filing types that initiate statutory Commission action dates. Filings that require statutory Commission action dates must follow the filing procedures of Parts 35, 154, 284 and 341.
34. The NGA Part 154 gas tariff program has specific file and document format requirements for files other than those that include tariffs. These electronic file and document format requirements are described in more detail in *Instruction Manual for Electronic Filing of the Rate Filings*.