

eTariff versus eLibrary

The purpose of this document is (1) to list the various requirements and fields mentioned – or alluded to – in FERC’s “NAESB Meeting on eTariff Development” memo and (2) to comment on the ability to incorporate those elements in either an eTariff database solution or an eLibrary database solution. In addition, other features that should be included in the solution that is chosen – but are not specifically mentioned in the FERC memo – are also discussed.

The Requirement or Field column in this table is color coded to delineate where each element comes from.

- ☞ **Red** = A requirement specifically listed (or alluded to) in FERC’s memo.
- ☞ **Green** = A requirement that any solution for the storage and processing of tariffs, contracts, and rate schedules should possess.
- ☞ **Blue** = A field (i.e. “metadata”) specifically listed in the FERC’s memo.

Requirement or Field	eTariff	eLibrary	Comments
FERC Identified Requirements			
Include tariff sheets in database with appropriate filing status information	Yes	Yes	Either eTariff or eLibrary approach will easily handle status information.
Adjust status of tariff sheets based on Commission action	Yes	Yes	Easily doable for either approach.
Create an effective tariff	Limited	Yes	eTariff will not have certain key elements of a tariff, such as diagrams. Also, eTariff will not have a tariff, contract, or rate schedule that looks at all like the original agreement negotiated by the parties. It will be a plain text representation of the document, but not the document itself. If multiple documents are loaded into one database, an effective document is difficult to extract.
Search metadata	Yes	Yes	Either approach handles metadata well.
Search full text	Yes	Yes	Either approach provides for full text searches.

Requirement or Field	eTariff	eLibrary	Comments
Compete electronic filing process from filing to final approval	Yes	Superior	eLibrary will be – by design – far superior in handling all of the related documents contained in a filing – transmittal letters, Excel worksheets, charts and graphs, and related documents. eTariff will have limited capability in this regard.
Support for filing of all supporting files (e.g. Excel schedules, transmittal letters, graphics, diagrams)	Limited	Yes. Superior & Flexible	<p>eLibrary is vastly superior in this regard, and is amenable to a variety of ways to accomplish this requirement, any of which will work fine.</p> <ol style="list-style-type: none"> 1. File the complete filing package including all supporting documents in bookmarked, text searchable PDF format. 2. File the new or revised tariff or rate schedule in text-searchable (PDF or original source) format, but include attachments within a separate PDF file containing supporting documents. 3. File the new or revised tariff or rate schedule in text-searchable (PDF or original source) format with all supporting documents in a ZIP file archive. 4. File all documents in their original source format and let the software convert it to text-searchable PDF files but with the original source files always available in the background.
Support for multiple filing “structures”	Yes	Yes	Either eTariff or eLibrary can be as flexible as desired in constructing hierarchical relationships between sections or records.
Easily view all of a utility’s tariffs and rate schedules	Yes	Superior	<p>While both approaches allow for easily viewing a single utility’s entire collection of tariffs and schedules, eTariff’s ability to provide such information in usable form has not been demonstrated.</p> <p>Furthermore, the eLibrary solution is superior because viewers will be able to view complete, original documents as negotiated and agreed to by the parties including any charts, graphs, diagrams and schedules. eTariff will present only a plain text representation of those agreements that will be missing many of the key elements contained in the original.</p>

Requirement or Field	eTariff	eLibrary	Comments
Suggested Requirements			
Does not violate the legal principal of “going beyond the four corners of the document.”	No	Yes	<p>One of the key principles of contract negotiation and agreement is that you don't go beyond what has been agreed to in the document . . . as it is written, as it is formatted, as it is presented for signature. eTariff violates this fundamental principle . . . what is contained in the database looks nothing like the original, agreed-to contract, and you will never be able to be 100% certain that key elements were not somehow left out in the cut and paste transfer of the contract language to the database.</p> <p>eLibrary presents none of these problems, because what you file is exactly the same document as was agreed to by the parties.</p>
Does not create more additional work than necessary to achieve the design goal.	No	Yes	<p>With an eLibrary solution, much of the filing work is completed during the completion of the contract, tariff, or rate schedule. All that is left is the administrative work of electronically filing the package of documents with the FERC with any descriptive information needed.</p> <p>In contrast, eTariff creates an enormous amount of additional work as the filing is cut and pasted into the database, reviewed for accuracy, restructured to fit the database software, and decisions are made as to what to do with document elements that can't be cut and pasted, like diagrams, charts, or tables where the formatting does not translate accurately.</p>
Supports – to the extent possible – all of the existing tools that are used to work with these documents now: Word, Excel, Acrobat and related tools.	No	Yes	<p>eTariff virtually ignores the existing tools the entire industry uses to work with these documents, and will continue to use to work with these documents, in favor of a text based database that takes a step backwards in functionality from what is used now. New software solutions should move technology forward in a cost-beneficial manner, not take a step backwards in functionality.</p>

Requirement or Field	eTariff	eLibrary	Comments
Supports easily obtaining – not just the relevant tariff or rate schedule itself – but ALL related documents made in connection with that filing (interventions, FERC orders, etc.)	No	Yes	This is an important distinction between the two solutions, because it indicates that the eLibrary solution, properly implemented with the right informational fields, is a MUCH more flexible solution than the database approach. Users are as likely to want all those surrounding documents, such as intervention filings and FERC orders, as they are to want just the tariff or rate schedule alone. eLibrary makes this easy. eTariff does not support this at all.
Provides an end product useful for all parties in the workflow process of working with these tariffs and rates schedules to the point where it is the preferred source for these documents.	No	Yes	<p>Since a document-based eLibrary solution will contain the original source documents, in their original source format, it will almost immediately become the preferred source for all users of these documents.</p> <p>eTariff would forever remain an adjunct. When users need to actually work with the documents, they are certainly not going to tolerate working with a plain text database without all of the tools of Word and Excel that they are used to using. Rather, they are going to do what they do now – locate (from somewhere else) an original source document and work with that. This will make eTariff a product that simply adds work with little if any benefit to users.</p>
Can be implemented quickly and start providing benefits right away.	No	Yes	<p>This project has been ongoing for years now. It has dragged on that long not because of any failings at all by the design or programming team, but because the wrong tool was chosen for the job.</p> <p>An eLibrary solution – using, as it does, an existing, highly regarded and robust document storage product – should be able to be implemented quickly with just a few programming changes. Those changes mostly have to do with adding metadata fields and in some cases modifying existing metadata fields. Also, some new search screens would have to be designed. These changes are trivial in comparison to the enormity of trying to make eTariff do a job that it simply was not designed to do.</p>
FERC-Identified Fields			
COMPANY ID	Yes	Yes	In the recording, processing and handling of field information, or “metadata,” there really is no difference in the two approaches. Either eTariff or eLibrary can do a fine job with these
SUBMISSION TYPE	Yes	Yes	
OPTION LETTER	Yes	Yes	

Requirement or Field	eTariff	eLibrary	Comments
FILING IDENTIFICATION	Yes	Yes	<p>fields, and there is no reason to favor one solution or another based upon their handling of metadata.</p> <p>That is not to say, of course, that one might choose different metadata depending on the solution chosen. For example, with eLibrary, you might add a specific field to record, say, a Rate Schedule or Tariff Reference Number for each specific schedule filed that would track everything filed in connection with that specific rate schedule for its lifetime. That might not be meaningful in a more limited eTariff context. A few of the fields suggested appear to be unnecessary in an eLibrary solution, as the relationship between sections will be implicit in the numbering and formatting of the document itself.</p> <p>Nonetheless, the principle remains the same: there is nothing in the processing of metadata that would favor one approach over the other.</p>
SECTION IDENTIFIER	Yes	Yes	
SECTION PARENT IDENTIFIER	Yes	Yes	
SHEET OR SECTION NUMBER	Yes	Yes	
SECTION TITLE	Yes	Yes	
SECTION TEXT	Yes	Yes	
SORTING VALUE	Yes	Yes	
EFFECTIVE DATE	Yes	Yes	
PRO FORMA FLAG	Yes	Yes	
PRIORITY ORDER	Yes	Yes	
ASSOCIATED FILING	Yes	Yes	
ASSOCIATED SECTION	Yes	Yes	
ASSOCIATED OPTION	Yes	Yes	

To summarize very succinctly the results of this table analysis, the strengths and weaknesses of each solution become readily apparent.

- **eTariff:** An eTariff approach will add a tremendous amount of unnecessary work for limited – or non-existent – benefit. Users will still work with tariffs, rate schedules and contracts using their existing tools of Microsoft Word, Excel, and Adobe Acrobat and simply – when finished – copy and paste as best they can into the new software because they have to, not because it will provide any benefit.
- **eLibrary:** A document-based, eLibrary solution will add little work above that already required to make filings, yet will provide a huge benefit to all parties because eLibrary is simple, easy to use, and already widely accepted. It would quickly become the preferred source for working with tariffs and rate schedules. It achieves all the goals of the project design, provides many additional benefits, and does all of this with but a fraction of the work that would be required via an eTariff approach.

The document-based, eLibrary solution is clearly to be preferred for this project.