

STATE OF CALIFORNIA
Budget Change Proposal - Cover Sheet
 DF-46 (REV 08/15)

Fiscal Year 2016	Business Unit 8660	Department Public Utilities Commission	Priority No. 001
Budget Request Name 8660-001-BCP-BR-2016-GB		Program 9900100- Administration	Subprogram

Budget Request Description
 eFiling Administration Support (eFAST) Platform Creation and Business Configuration Projects

Budget Request Summary

The California Public Utilities Commission (CPUC) requests \$5.35 million (various CPUC special funds) and 6.3 positions in 2016-17 to develop and deploy a web-based platform solution—eFiling Administration Support (eFAST), which will serve as the common, scalable, CPUC enterprise-wide foundation upon which business program applications will be built and deployed. The platform will be configured for the Transportation Carrier Portal (TCP), Informal Submissions Portal (ISP), and Program Claims Management System (PCMS), subordinate projects to create business program specific applications. The platform will serve as a hub for customer interaction with the CPUC, including submitting filings (documents and data), maintaining customer accounts, making payments for fees and programs, and submitting inquiries. This proposal requests 6.3 permanent positions in 2016-17 and an additional 3.7 permanent positions in 2017-18 and annually thereafter along with total funding in the amount of \$5,350,000. This amount covers 6.3 positions and hardware and software needs to implement eFAST and configure the program specific solutions. This amount will be administratively distributed across the following special funds: (0462) Public Utilities Commission Utilities Reimbursement Account; (3089) Public Utilities Commission Ratepayer Advocate Account; (0042) State Highway Account State Transportation Fund; (0046) Public Transportation Account State Transportation Fund; (0412) Transportation Rate Fund; (0461) Public Utilities Commission Transportation Reimbursement Account; (0464) California High-Cost Fund-A Administrative Committee Fund; (0470) California High-Cost Fund-B Administrative Committee Fund; (0471) Universal Lifeline Telephone Service Trust Administrative Committee Fund; (0483) Deaf and Disabled Telecommunications

Requires Legislation <input type="radio"/> Yes <input checked="" type="radio"/> No	Code Section(s) to be Added/Amended/Repealed
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Does this BCP contain information technology (IT) components? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, departmental Chief Information Officer must sign.</i>	Department CIO Reza Yazdi <i>Reza Yazdi</i> <i>in behalf of Reza Yazdi</i>	Date 01-05-16
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For IT requests, specify the date a Special Project Report (SPR) or Feasibility Study Report (FSR) was approved by the Department of Technology, or previously by the Department of Finance.

FSR SPR Project No. 8660-080, 068, 071, and 066 Date: Submitted 6/8/15

If proposal affects another department, does other department concur with proposal? Yes No
 Attach comments of affected department, signed and dated by the department director or designee.

Prepared By <i>Reza Yazdi</i> Reza Yazdi	Date 01-05-16	Reviewed By <i>Jack Dwyer</i> Jack Dwyer	Date 01-05-16
Department Director <i>Timothy J. Sullivan</i> Timothy J. Sullivan	Date 01-05-16	Agency Secretary	Date

Department of Finance Use Only

Additional Review: Capital Outlay ITCU FSCU OSAE CALSTARS Dept. of Technology

Type: Policy Workload Budget per Government Code 13308.05.

PPB	Original Signed By: Ellen Moratti	Date submitted to the Legislature 1-7-16
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A. Budget Request Summary

The CPUC receives various filings, documents, data, and payments from regulated entities (constituents or customers). With some exceptions, work processes and procedures are mostly paper-based with a strong reliance on staff to manually validate, analyze, update, and process these filing submissions. Efforts to increase efficiency and improve customer service through technology have not been integrated and have instead resulted in fragmented, stand-alone solutions that cannot provide an informative, transparent, and consolidated view of CPUC business. No common automated process exists for similar filings across departments, nor is there any central location or method by which regulated entities can engage in two-way interactions with the CPUC, as they submit and track filings and payments.

The CPUC will implement a standard, enterprise-wide technology platform, known as eFiling Administration Support (eFAST) which will serve as the hub for customer interaction. This platform will provide the foundation for:

- Maintaining customer accounts and contacts
- Receipt, processing, and disposition of documents and data
- Submittal of inquiries and follow up responses
- Receipt of payments for various fees and programs
- Scaling, configuring and deploying for future business applications

The platform will be utilized and configured for the proposed Transportation Carrier Portal (TCP), Informal Submissions Portal (ISP), and Program Claims Management System (PCMS) subordinate projects to create business program specific applications.

The new solution will be implemented using a combination of in-house and contracted resources. The CPUC will procure:

- Project management support resources to assist with the implementation; Independent Verification and Validation (IV&V) services, and Independent Project Oversight Consulting (IPOC) services from the Department of Technology.
- Primary solution vendor services to perform business analysis as well as the initial set-up, configuration, and integration of the Feasibility Study Report (FSR)-recommended Best of Breed Toolset.

This proposal seeks approval for CPUC positions and funding to accomplish implementation of this proposed solution and business application configuration as recommended in the submitted FSRs. The total budget augmentation requested to implement eFAST and the business program specific applications is \$5,350,000, which includes a one-time software customization (via contracted resources) and the following permanent positions:

Total Permanent positions: (6.3 positions in 2016-17 and an additional 3.7 positions in 2017-18 and annually thereafter)

- Four (4) Associate Information Systems Analyst (Specialist)
- Four (4) System Software Specialist I (Technical)
- One (1) Staff Information Systems Analyst (Specialist)
- One (1) Data Processing Manager I

B. and C. Background/History and State Level Considerations

The CPUC regulates privately owned public utilities operating in the State of California, and performs mission-critical regulatory work, such as maintaining official judicial records; implementing regulation of electric, natural gas, water, telecommunications, railroad, rail transit, and passenger transportation entities; and providing for timely processing of payments associated with CPUC regulations. The main functions that support this work involves the filing of documents (such as reports, Advice Letters, applications, or program claims) and submitting financial payments by regulated entities. For the most part, these functions are currently conducted using manual processes and, in many cases, using non-electronic documents. The CPUC will automate the filing of these documents and payments. The CPUC will develop a standard, enterprise-wide technology platform, using a common architecture and strategy, upon which IT applications for electronic filings (e-filings) and submissions of documents and data will reside. The California Department of Technology has instructed the CPUC as a conditional approval of all the related Stage 1 Business Analysis to develop this enterprise platform before designing and building any further new e-filing applications.

The vision for the E-Filing Administration Support (eFAST) program is to support the CPUC's work to protect public safety, promote reliable utility service at reasonable rates, and increase transparency to the public, while improving business processes and transparency within the CPUC. The eFAST solution will provide the technology platform that enables the replacement of current systems and processes that are cumbersome, antiquated, and paper-driven.

The eFAST program is made up of the core architecture implementation project (the eFAST Platform) and three business configuration projects:

- Transportation Carrier Portal (TCP)
- Informal Submissions Portal (ISP)
- Program Claims Management System (PCMS)

Four feasibility studies were written and submitted to Department of Technology to 1) analyze potential technology solutions for each project in the eFAST program, 2) estimate individual project costs and schedules, and 3) select the preferred solutions.

The eFAST platform will support the intake, routing, tracking, disposition, and status-setting of both formal and informal submissions of reports, filings, and other data and documents to the CPUC. The three projects listed below will implement the functionality and business rules to automate e-filing of specific types of submissions.

Transportation Carrier Portal

The CPUC's Transportation Enforcement Branch (TEB) is responsible for providing for safe and reliable passenger and household goods transportation services to the public at reasonable rates. TEB staff verify carriers meet safety requirements (such as conducting criminal background checks for drivers, and carrying appropriate commercial insurance), issue permits and licenses, revoke or suspend permits and licenses for carriers that fail to comply with safety requirements, and work with law enforcement agencies to stop illegal operators who pose safety and financial hazards to the public.

TEB's License Section regulates four types of transportation carriers, each with unique regulatory processes and requirements:

- Private passenger carriers, such as limousines, town cars, and airport shuttles. These carriers are known as "for-hire" passenger carriers.
- Household goods carriers, such as moving companies.
- Transportation network companies, such as Lyft and UberX.
- Charter-party carriers, such as tour buses.

TEB regulates more than 7,000 transportation carriers. Each carrier provides reports and pays licensing fees to the CPUC on a quarterly basis. With the exception of insurance filings, every report or payment is currently provided using paper forms sent via US Mail (Transportation carrier insurance providers can file proof-of-insurance electronically, using the Insurance E-Filing system implemented March 1, 2013).

Intake processing of applications, renewals, equipment updates, payments, and reports (other than insurance reporting) is highly manual, clerical work for the TEB's License Section. Intake processing activities include receiving documents by mail, sorting and distributing the documents, and examining the documents for completeness. Most of this clerical work could be automated if carriers could file applications and registrations electronically.

Once intake is complete, TEB's License Section performs analytical processing work, such as examining documents for accuracy, and returning deficient documents to carriers. The License Section also enters applications, renewals, equipment, and reporting data into the Transportation Management Information System (TMIS). Some of this clerical work could be automated if carriers could file applications and registrations electronically.

Informal Submissions Portal

Advice Letters

The CPUC exercises legislative and judicial powers to set the rates and regulate the services of private investor-owned public utilities and transportation companies. Desired changes to published rates and services are submitted to the Commission for consideration in formal or informal proceedings.

The Commission receives an average of over 5,000 Advice Letters (informal filings) submitted annually to three different Industry Divisions: Communications (over 4,000), Energy (700-800), and Water and Audits (200-300). Advice Letters are generally the filing method for the smaller utilities, as they go through a quicker adjudication process and can often be filed without legal assistance. The large utilities use Advice Letters for compliance filings. The advice letters are filed by paper to the Energy Division and the Division of Water and Audits; the Communications Division receives filings by paper, email, and/or CDs. Advice letters are processed based on three categories:

- Tier 1 Advice Letters: Generally implement routine changes to tariffs that either have already been authorized by the Commission or that use a methodology that has already been authorized by the Commission. Tier 1 advice letters go into effect when filed or shortly thereafter, even while the Industry Division is reviewing them.
- Tier 2 Advice Letters: Typically include minor proposals made on a utility's own initiative. In some cases, these advice letters involve more complicated or difficult matters that have already been approved by the Commission but haven't been completely spelled out in a decision. Tier 2 advice letters become effective 30 days after filing unless suspended.
- Tier 3 Advice Letters: The utility can reasonably expect that an official resolution by the Commission may be needed, or the utility may request a resolution. If the Industry Division determines that a resolution is needed, the advice letter typically doesn't become effective until the resolution is issued.

AB 1182 (Chapter 372, Statutes of 2005) requires businesses be allowed to interact with the CPUC in an efficient manner, such as supplying information to the Commission via the Internet, helping to decrease the costs of regulation by reducing the need to reproduce such information on paper. Furthermore, AB 1182 recommends that the CPUC propose a plan for the electronic submission of Advice Letters (ALs) if deemed feasible. Following AB 1182, the CPUC implemented several measures to increase public access to documents and proceedings. These measures included the implementation of electronic filing (E-Filing) for formal proceedings in September 2006, the web publication of revised versions of proposed decisions and resolutions in 2007, and the implementation of a document subscription service in October 2009.

The CPUC submitted a Feasibility Study Report (FSR), "Implementation Expansion of E-Filing" on September 22, 2006. The FSR was approved by the Department of Finance on June 27, 2007, and assigned project number 8660-45. The Advice Letter E-Filing project was initiated in 2008, and the Requirements Phase was completed. The Design Phase was to begin next. However, due to budgetary constraints imposed upon the CPUC by the

Governor's Executive Order S-16-08 (December 2008) requiring State agencies to reduce expenses, the CPUC requested from the Office of the State Chief Information Officer that funds be redirected and this project be suspended. The CPUC withdrew project 8660-45 and submitted a new proposal with the 2013/2014 filing of the IT Capital Plan.

Other Informal Submissions

In addition to Advice Letters, there are other Informal Submissions that support CPUC decision-making, or are required in response to a CPUC decision. Therefore, to view Informal Submissions as a whole requires considering these other non-Advice Letter Informal Submissions as well. There are hundreds of different Informal Submissions, in addition to Advice Letters, thousands arrive yearly, and the tracking support for these is minimal or non-existent.

The problems and opportunities that apply to Advice Letters also apply to these other Informal Submissions. While the processing of these filings is usually simpler, these share many of the problems that constrain Advice Letter processes: they also arrive in multiple hard- and soft- copy formats, are not often filed in a consistent place or media; the filer is still interested in checking the status of their filing; and the need for CPUC staff and the public to access this information is just as great. Advice Letters have the benefit of a mainly manual process that provide the content adequate attention. The other Informal Submissions, however, are subject to the limited time staff has available to consider the content and act accordingly. Many of these Informal Submissions can have a safety impact or a fiscal impact of many millions of dollars, or more, and warrant adequate consideration in the best interest of the CPUC's mission to the public and to industry.

Since all legacy processes are manual and supported exclusively by CPUC business, and since this BCP is requesting new resources for IT to build and maintain new automated processes, there is no history of PYs that supported eFAST-like automation in IT.

The eFAST platform supports AB 1182 and AB 2408 (Chapter xxx, Statutes of 20XX) by allowing businesses to interact with the CPUC via the internet, and by consolidating disparate business need solutions into a single architectural platform.

Programs Claims Management System

The CPUC is responsible for ensuring consumers have safe, reliable, affordable, and universal access to telecommunications services. The CPUC has oversight responsibilities for several Public Purpose Programs (hereafter referred to as "Programs") that ensure universal access to telecommunications services:

- California High Cost Fund-A (CHCF-A): Provides subsidies to rural telecommunications carriers, in order to reduce rates for rural consumers.
- California High Cost Fund-B (CHCF-B): Provides subsidies to "carriers of last resort" for high-cost areas, in order to reduce rates for consumers in high-cost areas.
- California Advanced Services Fund (CASF): Provides grants to telecommunications carriers that provide broadband in underserved areas, in order to bridge the "digital divide."
- California Teleconnect Fund (CTF): Provides discounted communications services to schools, libraries, hospitals and other non-profit organizations.
- Deaf & Disabled Telecommunications Program (DDTP): Provides telecommunications equipment and relay services to consumers with hearing, vision, speech, cognitive, and mobility disabilities.
- California LifeLine Telephone Program (California LifeLine): Provides discounted basic telephone service to low-income consumers.

Currently, these programs are funded by ratepayer surcharges. Telecommunications carriers bill and collect surcharges, and remit the surcharge monies to a financial institution. Program equipment vendors and service providers then submit claims to the CPUC for reimbursement. The equipment vendor or service provider submits an invoice to the CPUC via email or US Mail. An analyst in the Communications Division (CD) reviews the

invoice, creates a paper voucher, and routes the voucher to the Fiscal Office. The Fiscal Office submits the voucher for approval from the State Controller's Office (SCO), which then cuts a check to the equipment vendor or service provider.

D. Justification

Three Stage 1 business proposals were submitted in FY13/14 to the Department of Technology (DOT). The justifications for these three proposals are listed below. However, before the CPUC was permitted to submit these as formal FSRs and BCPs, DOT required that the CPUC leverage commonalities between all three efforts and design a single architecture. Below are three conditional approval responses from DOT regarding the three FY 13/14 S1BA proposals (justification for the eFAST Platform). Following these approvals, the justifications for each of the three business proposals (TCP, ISP and PCMS) are provided.

The eFAST Platform

Transportation Carrier Portal (TCP) Proposal

"Approved with conditions. The Department of Technology supports the proposal pending the CPUC's leverage of the existing E Filing System and study of the feasibility of consolidating Advice Letters and E Filing applications into a single centralized solution. Pursuant to SAM 4819.36, DGS is subject to oversight requirements as determined by the complexity and reporting requirements of the project."

Advice letters and Informal Submission e Filing Portal (ISP) Proposal

"Approved with conditions. The Department of Technology supports the proposal pending the CPUC's leverage of the existing E Filing System and study of the feasibility of consolidating Advice Letters and formal E Filing applications into a single centralized solution."

Program Claims Management System (PCMS) Proposal

"Approved with conditions. The Department of Technology recommends conditional approval subject to the CPUC studying the feasibility of a single centralized system for claims processing, program tracking, and reporting systems."

Transportation Carrier Portal (TCP)

The first justification for this project is to reduce the intake processing workload for applications, renewals, and equipment updates for TEB staff. Since 2001, the total regulated transportation carrier population increased by 124percent from 3,426 to 7,682. Over the same time period, the number of authorized positions has decreased by 36percent, from 22 to 14. The current manual intake processes for applications, renewals, and equipment updates are labor-intensive. The current manual intake processes are also vulnerable to data entry errors which, aside from their impact on carrier operations and public safety, are time-consuming to correct.

The second justification for this project is to reduce application processing delays for transportation carriers. A persistent decline in staffing over the last 12 years, concomitant with a 124percent percent increase in license applications and renewals, has resulted in the accumulation of a substantial application backlog. This backlog creates significant delays in the intake, review and issuance of new licenses for transportation carriers who wish to start new businesses or grow their existing fleets in response to market conditions; it also generates additional workload for TEB staff by increasing the volume of carrier phone and email inquiries about application status.

The backlog and elapsed processing time from application filing to approval is continuously increasing. The lag time from application filing to approval ranges from an average of 5 weeks to 12 weeks.

Informal Submissions Portal (ISP)

This project addresses problems with Advice Letters and other informal submission types.

Advice Letters

The current Advice Letter process is problematic for several reasons:

1. Poor internal visibility to the filings: Advice letters are kept in division file rooms, where they are not readily searchable/retrievable.
2. Poor public visibility to the filings: To view advice letters, members of the public must file a time-consuming formal records request, or search for filings on the utility's website.
3. Inconsistent submission formats: The bulk of the submissions are via US mail or courier, in either paper form or on CD. Some submissions are via email.
4. Inconsistent storage formats and retention schedules: Paper documents are stored in file cabinets in division file rooms, then discarded or moved to off-site storage based on availability of space. CDs are stored in containers or in file cabinets. Filings are at risk of being misfiled, damaged, or lost.
5. Highly manual processing: 7.5 PYs are dedicated to intake, dispatch, and storage of Advice Letters. A Program Technician manually date/time stamps each Advice Letter upon receipt, reviews it for format, records it into Proposal and Advice Letter (PAL) application, copies it, files the copy, and passes it to the assigned analyst for review. All of these tasks could be fully or partially automated.
6. Tracking of Advice Letters is often split between the PAL and spreadsheets that are used to maintain Advice Letter data elements that are not supported by PAL. This approach, while currently necessary, is inefficient and error-prone.
7. While the PAL application, sometimes augmented by spreadsheets, provides limited tracking of Advice Letters, the processing and routing of Advice Letters is entirely manual, with routing support only from Microsoft Outlook.
8. PAL permissions to access documents attached to Advice Letters is too restrictive and insufficiently granular. As a result, analysts must request involvement of Tariff Unit staff to access uploaded documents.

Other Informal Submissions

Problems with informal submissions include:

1. Informal submissions are typically submitted to an individual, branch, or section at the CPUC. When a person leaves, or a branch is reorganized, it is difficult to ensure the process continues.
2. Informal submissions arrive as email, email attachments, paper copies via postal mail or hand delivered, or files on electronic media. These varied mechanisms of delivery are inefficient for the utilities and business as well as for the Commission.
3. The current processing includes many steps, such as date-stamping individual pages, sending submissions back for corrections, and other labor-intensive handling.
4. The current environment that requires multiple paper copies of submissions, and printing extremely large files that arrive electronically, consumes volumes of paper, diminishing the CPUC strategic business goal of protecting the environment, and propagating the risk of missing or incomplete information.
5. Several independently-developed applications to help process and track Informal submissions have been created. The risk posed by these systems is significantly tied to the mutability of staff. Knowledge of these systems is difficult to pass on when the current "expert" leaves. Plus, the Divisions are dependent upon the interest and ability of another staff member to understand and maintain the system.

6. Carriers, utilities, applicants, and members of the public must call the CPUC and have an analyst research their submissions to determine its status.
7. There is no consistent mechanism to ensure that compliance reports are submitted as required. This undermines the ability of the CPUC to meet many of its strategic business goals.
8. There is no reliable mechanism for linking related documents. For example, when an informal submission requires subsequent compliance reporting, that relationship is easily lost over time. Once lost, it is difficult for staff to determine whether the compliance report continues to be necessary.
9. Many informal submissions are kept in division files, as paper or on CDs, where they are not readily searchable or retrievable by the utilities, public, or CPUC. This also makes enforcement of a consistent document retention strategy impossible.
10. Paper files are often archived offsite for long-term storage. This greatly slows the ability of CPUC staff and the public to access these documents directly.
11. Manual processing, routing, and tracking leaves staff without the time to perform analysis of compliance reports, applications, or complaints. Many of these informal submissions have a fiscal impact, and some can have a safety impact, but the time required to manually receive and file them does not allow time for adequate analysis of the submission content.

Program Claims Management System (PCMS)

There are two key justifications for this project: reduce manual processing time (and thus cost) and reduce overpayment to carriers.

Manual Processing

Claims processing is manual, labor-intensive, and time-consuming. The processing of each claim requires approximately a range from 45 minutes to 1620 minutes of CD analyst time depending on the type of claim. Each Program has its own unique claim process. An estimate of the volume of claims processed annually is below:

- CHCF-A: 120 yearly claims with a total value of \$33 million from 13 service providers
- CHCF-B: 84 yearly claims with a total value of \$22 million from 4 service providers
- CASF (Grants): 100 yearly claims with a total value of \$120 million (one-time) from 50 service providers
- CASF (Consortia): 56 yearly claims with a total value of \$5 million from 14 service providers
- CTF: 1200 yearly claims with a total value of \$115 million from 70 service providers
- DDTP: 480 to 600 yearly claims with a total value of \$55 million from 30 equipment vendors and service providers
- California LifeLine: 400 yearly claims with a total value of \$170 million from 33 service providers

Manually processing claim submissions, creating vouchers, and tracking voucher status creates a large clerical workload for CD analysts, reducing the time they can dedicate to their analytical and consumer protection work. A processing backlog can also delay payments to equipment vendors and service providers, and possibly lead to late payment interest charges, although such delays are not common.

Overpayments

Six of 33 Lifeline carriers were chosen for an audit to understand the amount of overpayments CPUC was making. This audit reviewed two one-year periods of July 1, 2008 through June 30, 2009 and from July 1, 2010 through June 30, 2011. The audit concluded that \$370,500 in overpayments were made by CPUC to the carriers.

A similar audit was conducted for the CTF program. Six of 70 carriers were audited for the one year period of July 1, 2009 through June 30, 2010. The audit concluded that \$260,027 in overpayments were made by CPUC to the carriers.

While CPUC has added controls to prevent overpayment, CPUC review of the program demonstrates that overpayments occurred primarily due to the carriers' non-compliance with the CPUC's directives with respect to the programs (CTF and California LifeLine.) The non-compliance may be due to the carriers' misinterpretation of the CPUC's directives. An automated process would limit the likelihood of misinterpretation and allow flagging of exceptions.

Since current manual processes limit centralized monitoring for overpayments, the State is at risk of overpaying vendors.

Opportunities

Significant opportunities exist for the CPUC to provide improved support to the public and to the utilities and increase staff effectiveness and efficiency with the benefit of a Web portal, workflow, and tracking system that will work with the existing Document Management system.

1. An environment that automatically guides informal submissions of each type to the correct person (via role-base) for processing is simpler for the CPUC as well as for the filers. This also supports continuation of required filings through organizational changes, and will result in significant staff time savings.
2. Consistent electronic formats for filing allow the Commission to develop simpler workflows for processing as well as freeing the utilities, and other filers, from sending filings on physical media.
3. Electronic filing permits an automated, systematic acknowledgment that the filing was received and online forms with front-end error checking and numbering eliminates the need to send filings back because of errors.
4. Electronic filing eliminates the need for massive volumes of paper to be printed and managed, also reducing the Commission's use of this resource.
5. A single application that adequately supports tracking of informal submissions will promote efficiency, consistency, and accuracy.
6. Electronic routing of informal submissions will support automated tracking of the progress of the Informal Submissions, virtually eliminating the possibility that files will be lost, and will save staff time.
7. A single workflow and tracking application will eliminate the need for functional areas to attempt to support separate unique tracking applications. This will also allow the Commission to develop a Web portal presence with a consistent look and feel, making access easier for the public and for the utilities.
8. Access to submissions, via a Web portal, will allow filers to check the status of their submission, at any time and as often as they wish, without having to call CPUC staff and wait for that person to complete a search for the submission and its status.
9. With an automated tracking system, staff is reminded when a required report has not been submitted. Beside the fines that may be due because of delinquent reporting, reports that support the Commission's strategic objectives will never be overlooked.
10. Many submissions have dependencies. Staff time will no longer be wasted on submissions that were dependent on another related submission requirement that has since been withdrawn or replaced.
11. With all informal submissions in an electronic format, that is readily searched and retrieved, the public and utilities will be able to quickly and efficiently identify and locate files they wish to access instead of waiting

for CPUC staff to locate and retrieve them.

12. Eliminating the need to archive files to storage in Sacramento via DGS will save CPUC time and money, while improving the ability of the public and the utilities to access relevant data. Having the non-confidential information available online will support the strategic business goal of providing transparency to the public. Also, the Commission can discontinue paying for transport and storage of paper files.
13. More analyst time for analyzing the reports and application data that is already required will allow the CPUC to protect public safety and improve utilization of Commission and public funds. This is particularly critical as changing conditions require an increasing number of reports and the time spent analyzing them.

E. Outcomes and Accountability

Myriad measurements and metrics for outcomes and accountability for the eFAST and subordinate business application projects were documented in detail in the approved Stage 1 Business Analysis (S1BA) unique for each respective project and FSR. The implementation of the eFAST platform will establish the foundation for achieving the goals from the four eFAST projects. Due to the mixture and wide variety of the metrics from the four eFAST projects, please refer to the individual S1BAs (Attachments A – D) for specific details. Below are highlights of the common strategy and goals and outcomes for the projects:

- Improve customer service and convenience for the public and utilities to interact with the CPUC
 - Increase turnaround time for filings and payments process resulting in quicker resolution
 - Increase in transparency and two-way communications between the CPUC and the California public
 - Increase goodwill with the public and utilities
 - Enable submission tracking
 - Improve public safety
 - Provide reliable utility service at reasonable rates
- Increase efficiency
 - Reduce staff time devoted to intake and processing manual filings and payments
 - Timely processing of filings and payments
 - Re-allocate staff from performing clerical work to more important analytical investigative, consumer safety and protection activities
 - Reduce delays in processing
 - Prevent overpayments, fraud and waste for public purpose programs
 - Reduce duplication of work
- Standardize and streamline information technology application delivery and administration
 - Centralize and standardize document handling
 - Centralize and standardize business process workflow – avoid redundancy
 - Allow online storage of documentation
 - Reduce number of silo applications
 - Centralize, streamline and standardize administration of authentication and access to the application
 - Improve user management and security
 - Reduce information asset risk
- Fulfilment of AB1182 which allows for electronic submission of Advice Letters and other Informal Submissions
 - Protect the environment by reducing paper
 - Reduce cost associated with managing paper
 - File submissions via the internet

Permanent Positions Required

The CPUC requests 6.3 positions beginning in 2016-17, increasing by 3.7 positions to a total of ten (10) permanent positions annually thereafter to support eFAST and the subordinate projects of Transportation Carrier Portal (TCP), Informal Submissions Portal (ISP), and Program Claims Management System (PCMS). All positions will be assigned to the CPUC Administrative Services Division, Information Technology Services Branch.

eFAST positions requested:

Associate Information Systems Analyst (Specialist) – Enterprise Infrastructure Support - Server

This Associate Information Systems Analyst (Specialist) will provide enterprise specific eFAST project and platform support performing the following duties:

- Server support for DNS and DHCP services and server availability
- Microsoft Exchange support
- Remote access set up and support
- Monitor and support for 24x7 public-facing services
- Applying server updates and security patches

Post eFAST project implementation, this position will be responsible for all ongoing server system maintenance and operations for the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

Systems Software Specialist I (Technical) - Enterprise Infrastructure Support - Virtualization

This Systems Software Specialist I (Technical) will provide enterprise specific eFAST project and platform support performing the following duties:

- Virtualization platform support for the eFAST stack
- Set up, support and maintain backup and recovery services
- Manage virtual server connectivity and new server connections
- Plan, create and maintain continuity and support documentation
- Application integration support for eFAST document management integration

Post eFAST project implementation, this position will be responsible for all ongoing virtualization server system maintenance and operations for the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

Systems Software Specialist I (Technical) – Database Administrator

This Systems Software Specialist I (Technical) will provide enterprise specific eFAST project and platform support performing the following duties:

- Systems software support for eFAST platform tools
- Maintain information and data security across platform and data sources
- Database platform patching
- Real time monitoring and support of production, test/development eFAST databases
- Middleware patch set updates and security patches
- Provide production release services for all code deployed to production for eFAST platform applications
- Maintain documentation on all facets of database and middleware installs and configurations

Post eFAST project implementation, this position will be responsible for all ongoing database administration system maintenance and operations for the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

Staff Information Systems Analyst (Specialist) – Business Analyst

This Staff Information Systems Analyst (Specialist) will provide enterprise specific eFAST project and platform support and will function as a business analyst for the eFAST project. This role will also become one of the re-directs for the business analyst role for the subsequent PCMS eFAST subordinate project. Duties will include:

- Development of requirements and design

- Create business and technical requirements and design documentation
- Perform testing functions including test plans, scripts, and test execution
- Develop end user application documentation
- Prepare and deliver end user training
- Analyze and implement complex eFAST platform enhancements and change requests
- Analyze new project requests that utilize the eFAST platform
- Provide support for ongoing training of eFAST platform and business applications
- Provide Tier 2 service desk end user support for the eFAST platform

Post eFAST project implementation, this position will be responsible for ongoing business analysis for the eFAST platform and business applications (please see Attachment E for Workload Measurement and detailed tasks).

Transportation Carrier Portal (TCP) positions requested:

Systems Software Specialist I (Technical) – Business Process Modeling Developer

This Systems Software Specialist I (Technical) will provide Business Process Modeling (BPM) Development. The eFAST platform is a configurable solution that relies heavily on BPM as its application delivery foundation. This developer will work directly with the procured implementation vendor to assist in the development of BPM for the TCP project and attend vendor-supplied knowledge transfer training to maintain the system upon transfer to M&O. Duties will include:

- Develop and maintain BPM workflow and data input forms for TCP and eFAST delivered applications
- Develop and maintain web services and xml services for transfer between data sources for TCP and eFAST delivered applications
- Develop and maintain mobile services for TCP and eFAST delivered applications
- Develop and maintain business rules and messaging components for TCP and eFAST delivered applications
- Support access to document management service (content server) and document handling
- Train Business Analysts and super users on use of BPM tools

Post TCP project implementation, this position will be responsible for ongoing BPM development system maintenance and operations for the TCP application, the eFAST platform, and subsequent business applications developed upon the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

Data Processing Manager I – Project Manager

This Data Processing Manager I will provide Project Management services for the TCP project and subsequent eFAST business applications. Duties include:

- All Project System Development Life Cycle (SDLC) management for TCP and subsequent eFAST business applications
- Manage PAL (Project Approval Lifecycle) for TCP and subsequent eFAST business applications
- Review of new eFAST platform project requests
- Manage eFAST platform project portfolio including committee scoring and prioritization

Post TCP project implementation, this position will be responsible for ongoing Project Management services for the TCP application, the eFAST platform, and subsequent business applications developed upon the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

Associate Information Systems Analyst (Specialist) – Data Center Technical Specialist

This Associate Information Systems Analyst (Specialist) will provide Data Center services for the TCP project and enterprise specific eFAST platform support. eFAST and the subordinate business applications will increase load on current servers as well as introduce new servers in Data Centers. The position will perform the following duties:

- Monitor data center and other facilities alarms on an extended timeframe to support TCP and eFAST platform public presence
- Manage server maintenance support and vendor hardware support contacts
- Schedule and perform file level backups to disk and tape
- Perform file level or system recoveries as required

- Update and maintain all operations documentation to reflect addition of the eFAST infrastructure and procedures
- Provide on and off-site support of multiple locations to maintain the environment for the eFAST delivery
- Provide asset distribution and tracking of all TCP/eFAST platform project assets

Post TCP project implementation, this position will be responsible for ongoing Data Center services and system maintenance and operations for the TCP application and the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

Associate Information Systems Analyst (Specialist) – Service Desk Representative

This Associate Information Systems Analyst (Specialist) will provide Service Desk end user support services for the TCP project and enterprise specific eFAST platform applications. The position will perform the following duties:

- Provide Tier 1 end user ticket support for TCP and subsequent eFAST delivered business applications
- Set up and configure TCP and eFAST client hardware and software
- Conduct basic end user tutorials and orientation upon PC setup for TCP and eFAST application users
- Support system testing and upgrades. Verify and document desktop configurations
- Create TCP and eFAST applications end user knowledge base
- Provide knowledge transfer to other Service Desk staff

Post TCP project implementation, this position will be responsible for ongoing Service Desk support services for the TCP application and the future eFAST platform business applications (please see Attachment E for Workload Measurement and detailed tasks).

Informal Submissions Portal (ISP) position requested:

Associate Systems Analyst (Specialist) – Business Analyst

This Associate Information Systems Analyst (Specialist) will function as a business analyst for the ISP project and perform the following duties:

- Development of requirements and design
- Create business and technical requirements and design documentation
- Perform testing functions including test plans, scripts, and test execution
- Develop end user application documentation
- Prepare and deliver end user training
- Analyze and implement non-complex ISP and eFAST platform enhancements and change requests
- Provide support for ongoing training of eFAST platform and business applications
- Provide Tier 2 service desk end user support for the eFAST platform

Post ISP project implementation, this position will be responsible for ongoing business analysis for the ISP application and also future business applications built on the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

Program Claims Management System (PCMS) position requested:

Systems Software Specialist I (Technical) – Business Intelligence Developer

This Systems Software Specialist I (Technical) will provide Business Intelligence (BI) services for the PCMS project and enterprise specific eFAST platform business applications performing the following duties:

- Provide services for data set handling and data loading for PCMS and eFAST applications
- BI visualization: Creation of widgets, dashboards, visualizations, location diagramming of point data and other graphical representations of data
- Provide ongoing user training on BI, provide outreach and training on data warehouse uses
- Analyze data to create and integrate existing CPUC data with PCMS and eFAST applications for analytics and reporting

- Create, support and maintain reports for PCMS and eFAST applications. Meet with end users to maintain and extend all eFAST related reporting

Post PCMS project implementation, this position will be responsible for all ongoing Business Intelligence system maintenance and operations for the eFAST platform (please see Attachment E for Workload Measurement and detailed tasks).

F. Analysis of All Feasible Alternatives

All four projects of the eFAST program were each presented in their respective FSRs with alternative means of implementation. CPUC reviewed the permutations of mixed alternatives and opted for an approach that uses the same alternative across each of the projects – namely, to procure an outside vendor to help install and configure each program deliverable. The chart below shows the different alternatives (alternative numbers are represented in each cell) for each project. Combined, this represents over 100 unordered permutations of alternatives.

Project	Configuration w/vendor	Status Quo	Configure by CPUC	Custom
eFAST	1	2	3	4
TCP	1		2	3
ISP	1		2	3
PCMS	1	2		3

eFiling Administration Support (eFAST)

The proposed solution **Alternative #1** is the most complete solution that meets the requirements for the eFAST platform and is consistent with the long-term vision and goals of the CPUC. The proposed solution satisfies all of the solution objectives and the high level technical and functional requirements detailed in this feasibility study report.

The evaluation criteria used in assessing this and other solution alternatives are:

- **Supports Business Strategy And Functionality** - The proposed solution meets all of the objectives identified in the S1BA and the business requirements.
- **Supports Technical Strategy** - The proposed solution supports the CPUC enterprise IT strategy and integrates with the CPUC IT environment – both the current environment and the future environment
- **Product Viability Over Time** – The CPUC considered the extent to which the platform solution supports ease of development of future applications through configuration, and the extent to which the solution could reasonably be expected to be supported by the manufacturer/vendor. The proposed solution provides a high degree of flexibility and configurability, and is the product of a well-known and respected company, Oracle.
- **Timeliness** – The CPUC considered the length of time it would take to implement the proposed solution and the other alternatives considered. Under this criterion, the proposed solution would require the shortest duration in comparison to the other alternatives.
- **Cost Effectiveness** – The CPUC considered the cost to implement, operate and enhance the system compared to other alternatives. The proposed solution has the lowest overall cost when including both the eFAST platform and future applications costs.
- **Impact to IT Organization** – The CPUC considered the impact to the IT organization in terms of the extent of re-skilling and/or training required to maintain and support the system. The proposed solution poses the lowest level of risk in that the CPUC infrastructure is predominantly Oracle-based and the toolset would also be Oracle-based; making the learning curve shorter.

Advantages of Alternative #1	Disadvantages of Alternative #1
<ul style="list-style-type: none"> • Meets or exceeds business needs • There are many vendors who are experienced in implementing the toolset 	<ul style="list-style-type: none"> • IT staff will require some training to learn new tools • While the new toolset does not require

<ul style="list-style-type: none"> • Shortest duration to implement eFAST platform • Highly configurable; enables faster time to market for future applications • Provides more flexibility for future applications • New tools do not require programming skills to configure • New tools will attract high quality employees • Newly trained IT staff will be better prepared to meet State's strategic IT goals • CPUC already owns some tools required, reducing hardware and software costs 	<p>programming skills to configure, configuration can be complex and not suitable for average end users</p>
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During the comparative analysis, the CPUC examined a number of approaches to satisfy eFAST requirements. The CPUC analyzed the following options to select the best solution to meet the requirements and objectives identified in the Business Analysis of the FSR:

- **Alternative #2:** Continue with the existing manual processes. This alternative was rejected without further analysis because the current manual processes require costly human resources to keep pace with upcoming legislation, increased volumes, and customer service expectations.
- **Alternative #3:** Purchase and implement a COTS/MOTS solution. This alternative was analyzed using the evaluation criteria described in Section 5.2 *Rationale for Selection*. After evaluation, this alternative was rejected because it does not represent the best value for CPUC. While it could meet the business needs, it would be more costly, take more time to implement, and have a greater impact to the CPUC IT infrastructure and staff.
- **Alternative #4:** Custom build a solution. After evaluation, this alternative was rejected because it does not represent the best value for CPUC. It presumably could have met the business needs, but would not align with Department of Technology Strategic Goal 5, CPUC IT strategies, or AB2408. Additionally, it would be more costly and take more time to implement.

Transportation Carrier Portal (TCP)

The proposed solution, **Alternative #1** to contract a vendor to implement TCP is the most complete solution that meets the requirements for the eFAST platform and is consistent with the long-term vision and goals of the CPUC. The proposed solution satisfies all of the solution objectives and the high level technical and functional requirements described in this feasibility study report.

The evaluation criteria used in assessing this and other solution alternatives include:

- **Supports Business Strategy And Functionality** - The proposed solution meets all of the objectives identified in the S1BA and the business requirements
- **Supports Technical Strategy** - The proposed solution supports the CPUC enterprise IT strategy and integrates with the CPUC IT environment – both the current environment and the future environment
- **Timeliness** – The CPUC considered the length of time it would take to implement the proposed solution and the other alternatives considered. The proposed solution will require the shortest duration in comparison with the other alternatives.
- **Cost Effectiveness** – The CPUC considered the cost to implement, operate and enhance the system compared to other alternatives. The proposed solution has the lowest overall cost when including

considering leveraging the eFAST platform and future applications costs.

- **Impact to IT Organization** – The CPUC considered the impact to the IT organization in terms of the extent of re-skilling and/or training required to maintain and support the system. The proposed solution poses the lowest level of risk in that the CPUC infrastructure is predominantly Oracle-based and the toolset would also be Oracle-based, resulting in a faster learning curve.

Advantages of Alternative #1	Disadvantages of Alternative #1
<ul style="list-style-type: none"> • Meets or exceeds objectives and requirements • There are numerous vendors experienced in implementing the proposed toolset • New tools do not require programming skills to configure • Utilizes the eFAST platform • Shortest duration to implement • Highly configurable • Provides flexibility for future applications • Newly training IT staff will be better prepared to meet the State's strategic IT goals 	<ul style="list-style-type: none"> • Vendor will need to come up to speed quickly by gaining knowledge of the Information Submissions processes • Potential for higher cost with using vendor resources

During the comparative analysis, the CPUC examined a number of approaches to satisfy the TCP solution requirements. The CPUC analyzed the following options to select the best solution to meet the requirements and objectives in the Business Analysis of the FSR:

- **Alternative #2:** Use CPUC resources to configure the TCP solution. On examination, this alternative is of little use because of resource limitations within the organization. The developers will be new to the eFAST toolset and there are limited resources to implement in a timely manner.
- **Alternative #3:** Custom build a solution. After evaluation, this alternative was rejected because it does not represent the best value for CPUC. It does not utilize the eFAST solution and therefore could introduce a new set of support requirements. It could have met the business needs, but would not align with California Department of Technology Strategic Goal 5, CPUC IT strategies, or AB2408. Additionally, it would be more costly and take more time to implement.

Informal Submissions Portal (ISP)

The proposed solution, **Alternative #1** to contract a vendor to implement ISP is the most complete solution that meets the requirements for the eFAST platform and is consistent with the long-term vision and goals of the CPUC. The proposed solution satisfies all of the solution objectives and the high level technical and functional requirements described in this feasibility study report.

The evaluation criteria used in assessing this and other solution alternatives are:

- **Supports Business Strategy And Functionality** - The proposed solution meets all of the objectives identified in the S1BA and the business requirements
- **Supports Technical Strategy** - The proposed solution supports the CPUC enterprise IT strategy and integrates with the CPUC IT environment – both the current environment and the future environment
- **Product Viability Over Time** – The CPUC considered the extent to which the platform solution supports ease of development of future applications through configuration, and the extent to which the solution could reasonably be expected to be supported by the manufacturer/vendor. The proposed solution provides a high degree of flexibility and configurability, and is the product of a well-known and respected company

- **Timeliness** – The CPUC considered the length of time it would take to implement the proposed solution and the other alternatives considered. Under this criterion, the proposed solution would require the shortest duration in comparison to the other alternatives
- **Cost Effectiveness** – The CPUC considered the cost to implement, operate and enhance the system compared to other alternatives. The proposed solution has the lowest overall cost when including both the eFAST platform and future applications costs.)
- **Impact to IT Organization** – The CPUC considered the impact to the IT organization in terms of the extent of re-skilling and/or training required to maintain and support the system. The proposed solution poses the lowest level of risk in that the CPUC infrastructure is predominantly Oracle-based and the toolset would also be Oracle-based; making the learning curve shorter.

Advantages of Alternative #1	Disadvantages of Alternative #1
<ul style="list-style-type: none"> • Meets or exceeds business needs • There are many vendors who are experienced in implementing the toolset • Shortest duration to implement eFAST platform • Highly configurable; enables faster time to market for future applications • Provides more flexibility for future applications • New tools do not require programming skills to configure • Newly trained IT staff will be better prepared to meet State’s strategic IT goals 	<ul style="list-style-type: none"> • Vendor will need to quickly gain knowledge of Informal Submissions processes

During the comparative analysis, the CPUC examined a number of approaches to satisfy ISP requirements. The CPUC analyzed the following options to select the best solution to meet the requirements and objectives in the Business Analysis of the FSR:

- **Alternative #2:** Use CPUC resources to configure the ISP solution. On examination, this alternative is of little use because of resource limitations within the organization. The developers will be new to the eFAST toolset and there are not enough of them to implement ISP in a useful timeframe
- **Alternative #3:** Custom build a solution. After evaluation, this alternative was rejected because it does not represent the best value for CPUC. It presumably could have met the business needs, but would not align with Department of Technology Strategic Goal 5, CPUC IT strategies, or AB2408. Additionally, it would be more costly and take more time to implement

Program Claims Management System (PCMS)

The proposed solution, **Alternative #1** to contract a vendor to implement PCMS is the most complete solution that meets the requirements for the eFAST platform and is consistent with the long-term vision and goals of the CPUC. The proposed solution satisfies all of the solution objectives and the high level technical and functional requirements described in this feasibility study report.

The evaluation criteria used in assessing this and other solution alternatives are:

- **Supports Business Strategy And Functionality** - The proposed solution meets all of the objectives identified in the S1BA and the business requirements

- **Supports Technical Strategy** - The proposed solution supports the CPUC enterprise IT strategy and integrates with the CPUC IT environment – both the current environment and the future environment
- **Product Viability Over Time** – The CPUC considered the extent to which the platform solution supports ease of development of future applications through configuration, and the extent to which the solution could reasonably be expected to be supported by the manufacturer/vendor. The proposed solution provides a high degree of flexibility and configurability, and is the product of a well-known and respected company.
- **Timeliness** – The CPUC considered the length of time it would take to implement the proposed solution and the other alternatives considered. Under this criterion, the proposed solution would require the shortest duration in comparison to the other alternatives.
- **Cost Effectiveness** – The CPUC considered the cost to implement, operate and enhance the system compared to other alternatives. The proposed solution has the lowest overall cost utilizing the eFAST platform
- **Impact to IT Organization** – The CPUC considered the impact to the IT organization in terms of the availability of resources. The proposed solution makes the best use of available resources.

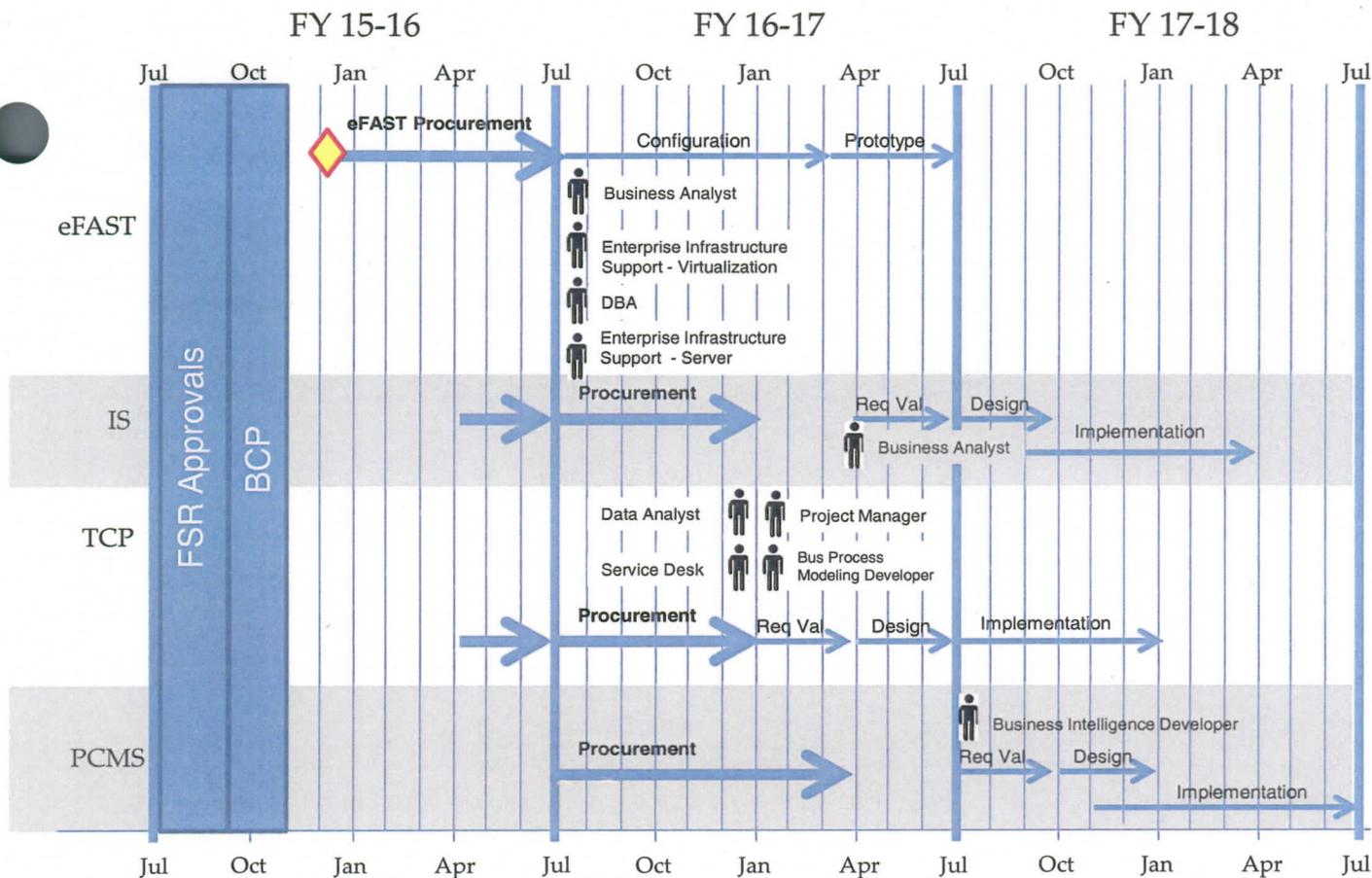
Advantages of Alternative #1	Disadvantages of Alternative #1
<ul style="list-style-type: none"> • Meets business objectives and requirements • Vendors are available who are experienced in Oracle products • Utilizes the eFAST platform • Lower cost 	<ul style="list-style-type: none"> • Vendor does not have intimate knowledge of CPUC business processes

During the comparative analysis, the CPUC examined a number of approaches to satisfy PCMS requirements. The CPUC analyzed the following options to select the best solution to meet the requirements and objectives in the Business Analysis of the FSR:

- **Alternative #2:** Continue with the existing manual processes. This alternative was rejected without further analysis because the current manual processes require costly human resources to keep pace with upcoming legislation, increased volumes, and customer service expectations.
- **Alternative #3:** Custom build a solution. This alternative was rejected without further analysis because it does not utilize the eFAST platform. It could have met the business needs, but would not align with Department of Technology Strategic Goal 5, CPUC IT strategies, or AB2408. Additionally, it would be more costly and take more time to implement.

G. Implementation Plan

Below is the eFAST Program high-level schedule showing when requested staff will be added. A chart is also provided that provides a brief project-level and CPUC division-level description of resource tasks.



Classification	Role	FSR	FY Start	Estimated Start	Comments
Associate Information Systems Analyst (Specialist)	Enterprise Infrastructure Support - Server	eFAST 8660-080	FY 16-17	July 2016	Server support, updates, patches
Systems Software Specialist I (Technical)	Enterprise Infrastructure Support - Virtualization	eFAST 8660-060	FY 16-17	July 2016	Virtualization support
Systems Software Specialist I (Technical)	Data Base Administrator	eFAST 8660-080	FY 16-17	July 2016	DBA / Systems Software Support for eFAST platform tools and sub solution development and delivery
Staff Information Systems Analyst (Specialist)	Business Analyst (Lead)	eFAST 8660-080	FY 16-17	July 2016	Business Analyst
Systems Software Specialist I (Technical)	Business Process Modeling (BPM)	TCP 8660-068	FY 16-17	January 2017	Business Processing Modeling Developer eFAST developer for workflow and form development.
Data Processing Manager I	Project Manager	TCP 8660-068	FY 16-17	January 2017	Project Manager
Associate Information Systems Analyst (Specialist)	Data Center Technical Specialist	TCP 8660-068	FY 16-17	January 2017	Backups, data center
Associate Information Systems Analyst (Specialist)	Service Desk Representative	TCP 8660-068	FY 16-17	January 2017	Service Desk support, tickets, end user support, desktop setup
Associate Information Systems Analyst (Specialist)	Business Analyst	ISP 8660-071	FY 16-17	April 2017	Business Analyst
Systems Software Specialist I (Technical)	Business Intelligence Developer	PCMS 8660-066	FY 17-18	July 2017	Business Intelligence Developer - Map data to BI tool for ad-hoc query and management reporting on base system data. Incorporate into data warehouse.

H. Supplemental Information

All of the full-time permanent staff positions will be located in San Francisco. Please note that the staffing cost estimates incorporate facilities cost.

I. Recommendation

Approve Alternative #1 listed in Section F for each of the eFAST projects. Alternative # 1 is the most complete solution that meets the requirements for the eFAST program and is consistent with the long-term vision and goals of the CPUC. If the solution is not implemented, then paper-based and labor-intensive regulation of the transportation, communications, water, and energy utilities of California will continue to adversely affect service, safety, and transparency.