

LAW OFFICE OF ANTONIO ROSSMANN

Attorneys at Law

380 HAYES STREET, SUITE ONE
SAN FRANCISCO, CALIFORNIA 94102 USA
TEL (01)(415) 861-1401 FAX (01)(415) 861-1822
www.landwater.com

ANTONIO ROSSMANN
ADMITTED IN CALIFORNIA
NEW YORK AND
THE DISTRICT OF COLUMBIA
ar@landwater.com

ROGER B. MOORE
ADMITTED IN CALIFORNIA
rbm@landwater.com

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via email, facsimile, and mail

Arthur G. Baggett, Jr., Chair and Hearing Officer
Dana Differding, Staff Counsel
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812

Re: IID-SDCWA Petition for Long Term Transfer;
Suggestions for Electronic Service

Dear Chair Baggett and Counsel Differding:

Protestant County of Imperial (County) submits the following suggestions regarding electronic service in this pending proceeding. These remarks are submitted as requested by staff at the conclusion of the workshop of 23 January 2002, and are based on experience with electronic service in the California Public Utility Commission's proceeding on PG&E's proposed divestiture of hydro facilities.

In general, the principal parties to a proceeding need to receive hard copies of all filings, particularly those of a lengthy or complex (i.e. tables and exhibits) nature. Despite our electronic age, there remains no substitute for having a complete working file for those most involved with it. And while web sites can provide instant availability of a large document such as an EIS, downloading the entire document can be time consuming and usually frustrating.

At the same time, when there are many participants who do not have the focussed interest of a formal protestant or party, electronic service provides a quick and inexpensive means of providing notice of relatively short papers. Even for the principal participants, electronic service as a duplicate of hard copy service has the advantage of speed.

Staff has advised Imperial that the number of formal parties and protestants in this proceeding may emerge as small, fewer than 20 in number and perhaps fewer than 10.

Under these circumstance it is not unreasonable to require that any item that must be served by the Board's rules be served in hard copy on these folks.

At the same time, the formal parties and protestants who do have and use electronic mail should be required to serve the others concurrently by electronic mail as well as hard copy.

As for other interested persons, the principal parties should be required to serve electronically those who desire that service and provide an electronic address. This additional service is at no cost to anyone.

To the extent that an interested person not a party or protestant submits material to the Board, that person should be required to serve hard copy the principal parties; and if that person is receiving electronic service, to also serve electronically both principal parties and the other interested persons on an electronic service list.

As for lengthy documents, these should not be served electronically, because of their ability to clog the electronic mail of those with limited storage or transmission speed; but their availability should be announced electronically so that those not receiving mandatory service can request copies from the originator as desired.

While these suggestions may not cover all the possibilities, their implementation might facilitate the participation of all in this proceeding at no additional cost.

Respectfully submitted,

Special Counsel to the County of Imperial

cc: Service list of 31 Jan 02 attached