

Safety Valve Process – “Quick Sheet”

Report Date: 1/3/18

State 1	State Contact Name and Telephone Number 2	Does PUC Handle Safety Valves 3*	Admin. Process (A) or is an Order (O) Required 4	Typical Number of Days Needed for Decision 5*	Waiver Request via Email (E) Or Telephone Call Or Both Accepted? 6	Copy of NANPA/PA “Denial” Required 7	Can SP Go Directly To PUC If Fails MTE/ Utilization? 8	Copy of Customer Order Required? 9
AK	John (Jess) Manaois 907-263-2174 john.paul.manaois@alaska.gov	Y	A	PUC has 180 days to address docketed matter.	Neither - Petition must be filed in writing with sufficient information to support the request.	Y	N	Y
AL	Tom Jones 334-242-2787 Tom.Jones@psc.alabama.gov	Y	O	30	Petition filed with Secretary/PSC	Y	N	Y
AZ	Del Smith 602-542-7277 dsmith@azcc.gov	Y	A	10	E or Letter	Y	N	Y
CA	Joanne Leung 415-703-1149 joanne.leung@cpuc.ca.gov	Y	A	10	E	Y	N	Y
CO	Susan Travis 303-894-2843 susan.travis@state.co.us	Y	A	10	E or letter	Y	N	Y
CT	Quat Nguyen 860-827-2696 quat.nguyen@ct.gov Peter Pescosolido 860-827-2616 Peter.Pescosolido@ct.gov	Y	A	5	Letter filed w/ DPUC under 96-11-10	Y	N	

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DC	Timour Skrynnikov 202-626-9172 tskrynnikov@psc.dc.gov	Y	A	16	Letter filed with Secretary/DC PSC	Y	N	Y
DE	Connie McDowell 302-736-7535 Connie.McDowell@state.de.us	Y	O	60	Letter	Y	N	Y
FL	Greg Fogleman 850-413-6574 gfoglema@psc.state.fl.us	Y	Admin Order	44	Petition filed w/ PSC	Y	N	N - customer will be contacted
IA	Joni Nicoll 515-725-7340 joni.nicoll@iub.iowa.gov	Y	O	10	Standard Filing Process	Y	N	N
ID	Carolee Hall 208-334-0364 carolee.hall@puc.idaho.gov	Y	O	15	E	Y	N	Y
IL	George Light 312-814-8591 George.Light@illinois.gov	Y	A	10	E or Letter	N	Y	Y
IN	Sally Getz 317-234-1543 sgetz@urc.in.gov Kendall Querry 317-233-5249 Kquerry1@urc.in.gov	Y	O	30	Neither	Y	N	Y
KS	Kelly Mabon 785-271-3228 k.mabon@kcc.ks.gov	Y	O	10	Neither	Y	N	N

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KY	Jim Stevens 502-782-2661 wjstevens@ky.gov	Y	O	20 (Depends on specific nature of request and sufficiency of information filed with the petition)	Neither - Petition must be filed in writing with sufficient information to support the request	Y (Snapshot of NANPA/PA website detailing denial is acceptable)	N (Evidence of denial by the Administrat or is required)	N (Must identify customer and discuss specific resources required and why)
LA		N				NOTE A	NOTE B	
MA	Armine Simonyan 617-368-1106 armine.simonyan@state.ma.us	Y	A	7	E	Y	Y	Y
MD	Juan Carlos Alvarado 410-767-8044 juan.alvarado@maryland.gov	Y	A	1	E	Y	N	N
ME	Rich Kania 207-287-1379 rich.kania@maine.gov	Y	A	7	Must be written	N	Y	Y
MI	Joshua McConkie 517-284-8198 McConkieJ@michigan.gov Wendy Thelen 517-284-8194 thelenw@michigan.gov	Y	A	10	E	Y	N	Y
MN	Bonnie Johnson 651-539-1880 bonnie.johnson@state.mn.us Marc Fournier 651-201-2214 marc.fournier@state.mn.us	Y	A NOTE	10	E	Y	N	Y

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MS	Tera Agee 601-961-5422 tera.agee@psc.state.ms.us Michael Douglas 601-961-5407 michael.douglas@psc.state.ms.us	Y	O	30	Petition filed with Executive Secretary of Mississippi PSC	Y	N	Y
MO	Kari Salsman 573-526-5630 Kari.Salsman@psc.mo.gov	Y	O	3 Weeks	Filed in a case	Y	N	Y
MT	Michael Dalton 406-444-6185 MDalton2@mt.gov	Y	O					
NC	Bridget Paschal 919-715-4006 paschal@ncuc.net	Y	O	5	Neither - Petition must be filed in writing with sufficient information to support the request.	Y	N	Customer request should be included but is not required.
ND	Patrick Fahn 701-328-4077 pfahn@nd.gov	Y	O	1 month	Petition must be in writing with both paper and electronic copy filed.	Y	N	Y
NE	Cullen Robbins 402-471-0230 cullen.robbins@nebraska.gov	Y	A	3-8 Business Days	E	Y	N	Y
NH	Lisa Cleveland 603-271-7031 Lisa.Cleveland@puc.nh.gov	Y	A	20	Neither - Petition must be filed in writing with sufficient information to support the request	Y	N	Y

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NJ	Majid Hassan 609-633-9738 Majid.Hasan@bpu.state.nj.us Harold Bond 973-648-3368 Harold.bond@bpu.state.nj.us	Y	A	15	E or Letter	Y	N	Y
NM	Mark Cessarich 505-827-6903 mark.cessarich@state.nm.us	Y	A/O	5	E- Safety valve checklist must be filed with the Staff	Y	N	N
NY	Lauri Mullen 518-457-5762 Lauriann.Mullen@dps.ny.gov	Y	A	10	Email state contact	Y	N	Y
OH	Robin Russell 614-466-0401 robbin.russell@puco.ohio.gov Jay Agranoff 614-466-0108	Y	O	Varies, but 10 business days is target if information is complete.	Legal Motion	Y	N	Y
OK	Jenny Dillion 405-521-4114 j.dillon@occemail.com PUDSubmissions@occemail.com	Y	A	Less than 10	E (Requests should be submitted to both emails listed)	Y	No	Yes
OR	Stephen Hayes 503-378-6122 stephen.hayes@state.or.us Stephane Maeda 503-378-5201	Y	A/O-Both	NA	Requests must be submitted to the Oregon PUC e- docket system	Y	N	Y

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PA	Mark Lum 717-783-6185 mlum@pa.gov Brian Mahla 717-787-6381 bmahla@pa.gov	Y	A	10 day review with a Secretarial Letter issued addressing the request	File 2 ways: File officially with PUC Secretary's Bureau, and additionally submit request and documentation to both email addresses in column 2.	Y	N	Y
PR	Zaida Cordero Lopez 787-756-0804 x3094 zcordero@jrtp.gobierno.pr	Y	O	NA	Neither	Y	N	Y
RI	Cynthia Wilson-Frias 401-780-2147 Cynthia.WilsonFrias@puc.ri.gov	Y	A/O–Both	30	Neither – via hard copy only	Y	N	Y
SC	James McDaniel 803-737-0812 jmcdanie@regstaff.sc.gov	Y	O	30	E	Y	N	N
SD	Patrick Steffensen 605-773-3201 Patrick.Steffensen@state.sd.us	Y	O	10	Neither (paper letter)	Y	N	Y
TN	John Hutton 615-770-6889 John.hutton@tn.gov	Y	O	10 days or next Agenda Conference	Neither	Y	N	Y
TX	Alicia Maloy 512-936-7387 Alicia.Maloy@puc.texas.gov	Y	A/O	Varies, generally less than 20 days	Neither	Y	N	Y
UT	Casey Coleman 801-530-6775 ccoleman@utah.gov	Y	A	3-5 days	E or written letter	Y	N	Y

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VA	Sheree King 804-371-9707 Sheree.King@scc.virginia.gov	Y	A	10	E	Y	N	Y
VT	Gregg Faber 808-828-2358 Gregg.Faber@vermont.gov	Y	Assigned to Hearing Officer	Case Dependent	Neither	Y	N	Y
WA	Rebecca Beaton 360-664-1287 rbeaton@utc.wa.gov	Y	O	20	E (request must be formal and filed, may be in the form of an email to the UTC Records with appropriate documents)	Y	Y	Y
WI	Peter Jahn 608 -267-2338 Peter.jahn@wisconsin.gov	Y	An order is required but issuance is delegated to the Division Administrator	10	The provider must file its request in the Commission’s Electronic Regulatory Filing System (ERF)	Y	No	No, however, staff does require the provider to file a letter from the customer outlining their numbering request as well as any other extenuating circumstances which should be considered.
WV	Steve Wilson (304) 340-0492 swilson@psc.state.wv.us	Y	An order is required.	Case dependent.	Neither	Y	N	N

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WY	Tom Wilson 307-777-5701 thomas.wilson@wyo.gov	Y	A	ASAP	Letter	Y	N	Y

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State	Notes
OK	Process is generally informal, initiated by an email or letter requesting safety valve action. Request must have supporting details as to denial, reason for additional resources, and anything else that might support request (customer letter, etc.). Usually processed within 3-5 days, but might be as long as ten days. If additional information is needed, this request is usually transmitted to the SP within a day or two after receipt of request.
NH	Service provider must submit a petition, which becomes a docketed item. Typical number of days does not include date telephone call was made or additional time required to obtain all necessary information. Staff issues a memo and draft letter (approving or disapproving) to the Commissioners after Division Director approval. Safety valve petitions have not to date requested expedited 10-day treatment per FCC NRO.
NE	Nebraska processes Safety Valve requests administratively but does obtain Commission approval at regularly scheduled meetings (usually weekly on Tuesday). Agenda is set three days before meeting date therefore, approval time normally would range from 3-8 business days.
GA	<p>The Georgia Public Service Commission meets to render decisions on cases on the 1st and 3rd Tuesday of each month. Therefore, the filing date and completeness of each filing is critical in determining how soon the petition is acted upon.</p> <p>The service provider can notify the contact person(s) that a request is forthcoming via telephone or email. However, according the GA PSC filing requirements, the service provider must also file with the Executive Secretary and the Consumer’s Utility Counsel Division. (To review the filing requirements, go to the GA PSC’s web site www.psc.state.ga.us, click on “PSC Calendar, Agendas, and Filing Procedures”.)</p>
KY	<p>Upon filing of a petition to override a NANPA/PA decision, the Commission staff will process the request and if sufficient grounds exist for a waiver to be granted, staff will issue a recommended Order for the Commission’s consideration. The petition is reviewed pursuant to 47 CFR 52.15 and there are no state rules/regulations pertaining specifically to such petitions.</p> <p>There are no established procedural schedules for waiver requests but Commission staff always attempts to process such filings in an expedited manner.</p>
MN	Although no commission order is required, each request is formally docketed.
NJ	Safety Valve waiver requests are handled administratively and at the staff level. A service provider may however appeal to the Board any adverse staff action.
SC	A directive may serve as an order if it contains an order number and note that it serves as an order.

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Legend Table A:

- 1 State Jurisdiction abbreviation (i.e., NY)
- 2 Name and telephone number of a contact at the state regulatory authority for waiver information.
- 3 Does the state regulatory authority handle safety valve waiver requests? (Y = yes or N = no)
- 4 Is a waiver decision administrative (A) or is an order (O) required?
- 5 How many days (XX) after requests are submitted is a decision typically made?
- 6 Can the waiver request be initiated using an email (E) and/or a telephone (T) call?
(Answer E/T if both are acceptable. Answer “Neither” if email and telephone are not accepted)
- 7 Does the state regulatory authority require a copy of the Denial from the NANPA or the Pooling Administrator?
(Y = yes or N = no)
- 8 If a service provider anticipates a denial, can the service provider come directly to the commission to file a waiver application w/o first applying to the NANPA/PA? (Y = yes or N = no)
- 9 Does the state regulatory authority require a copy of the customer order if the waiver request is to satisfy a specific customer need? (Y = yes or N = no)

NOTES:

NOTE A – To date, the Louisiana PSC has addressed petitions following NANPA denial and, after review, has sanctioned the issuance of additional numbers.

NOTE B – The FCC orders suggest state regulatory authority’s involvement should begin only after a request has been made through NANPA and the request has been denied. We have no reason to believe the Louisiana PSC will act in any manner other than what has been done procedurally with respect to the previous carrier requests.

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