



**California Public Utilities Commission**

**California Public Utilities Commission  
Telecommunications User Fees and  
Filing System (TUFFS)**

**Project #8660-094**

**Special Project Report (SPR)  
June 3, 2024**

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# 1. Project Approval Transmittal

<b>Information Technology Project Request</b>			
<b>Special Project Report Executive Approval Transmittal</b>			
<b>Agency/state entity Name</b>			
California Public Utilities Commission (CPUC)			
<b>Project Title (maximum of 75 characters)</b>			<b>Project Acronym</b>
Telecommunications User Fees Filing System (TUFFS)			TUFFS
<b>Project ID</b>	<b>Approval Date</b>	<b>State entity Priority</b>	<b>Agency Priority</b>
8660-094		1	1
<p>I am submitting the attached Special Project Report (SPR) in support of our request for the California Department of Technology’s approval to continue development and/or implementation of this project.</p> <p>I certify:</p> <ul style="list-style-type: none"> <li>• The SPR was prepared in accordance with the State Administrative Manual Sections 4945-4945.2, my agency/state entity has considered the cost benefits analysis associated with the proposed project changes and the changes are consistent with our information management strategy as expressed in our current Agency Information Management Strategy (AIMS).</li> <li>• The acquisition of the applicable information technology (IT) product(s) or service(s) required by my department that are subject to Government Code 7405 applying Section 508 of the Rehabilitation Act of 1973 as amended meets the requirements or qualifies for one or more exceptions (see following page).</li> <li>• The document(s) being submitted are accessible to persons with disabilities based on the requirements specified in Section 508 of the federal Rehabilitation Act of 1973, as amended, the Government Code section 11135, and the Web Content Accessibility Guidelines (WCAG 2.0).</li> </ul> <p>I have reviewed and agree with the information in the attached Special Project Report.</p>			



Telecommunications and User Fee Filing System (TUFFS) *Special Project Report*

APPROVAL SIGNATURES		
Communications Director		Date Signed
		3/20/2024
Printed name:	Robert Osborn	
Carrier Oversight & Programs Branch		Date Signed
		03/18/2024
Printed name:	Risa Hernandez	
Project Manager		Date Signed
		3/6/2024
Printed name:	Lisa Brooks	
IT Architect		Date Signed
		3/6/2024
Printed name:	Michael Bonner	
Application Web Development IT Lead		Date Signed
		03/06/2024
Printed name:	Karthy Paramananthan	
Information Security Officer		Date Signed
		03/25/24
Printed name:	Jesse Mann	
Budget Officer		Date Signed
		3.28.2024
Printed name:	Harsh Thakar	
Deputy Executive Director		Date Signed
		4/2/2024
Printed name:	Ryan Dulin	
Executive Director		Date Signed
		4/10/2024
Printed name:	Rachel Peterson	

By signing and submitting this form, you are requesting the California Department of Technology to evaluate and consider your submission for approval. In addition, you are authorizing the California Department of Technology to recover costs related to the evaluation of the proposed project. [Government Code (GC) §11255, GC §11544, GC §11545, and GC 11546]



## Executive Approval Transmittal IT Accessibility Certification

Yes or No

Yes	<b>The Proposed Project Meets Government Code 7405 / Section 508 Requirements and no exceptions apply.</b>
-----	--

Exceptions Not Requiring Alternative Means of Access

Yes or No	Accessibility Exception Justification
No	The IT project meets the definition of a national security system.
No	The IT project will be designed, developed, and deployed online and accessed only by pre-approved personnel for maintenance, repair, or occasional monitoring.
No	The IT acquisition is acquired by a contractor incidental to a contract.

Exceptions Requiring Alternative Means of Access for Persons with Disabilities

Yes or No	Accessibility Exception Justification
No	Meeting the accessibility requirements would constitute an “undue burden” (i.e., a significant difficulty or expense considering all agency resources). Explain:
	Describe the alternative means of access that will be provided that will allow individuals with disabilities to obtain the information or access the technology
No	No commercial or solution is available to meet the requirements for the IT project (does not require a fundamental alteration) or provides accessibility. Explain:  Describe the alternative means of access that will be provided that will allow individuals with disabilities to obtain the information or access the technology.

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

**2. Information Technology: Project Summary Package**

*2.1. Section A: Executive Summary*

<b>1.</b>	<b>Submittal Date</b>	<b>May 13, 2024</b>
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		<b>SPR 1</b>	<b>PSP Only</b>	<b>Other:</b>
<b>2.</b>	<b>Type of Document</b>	<b>X</b>		
	<b>Project Number</b>	<b>8660-094</b>		

			<b>Estimated Project Dates</b>	
<b>3.</b>	<b>Project Title</b>	Telecommunications User Fees & Filing System (TUFFS)	<b>Start</b>	<b>End</b>
	<b>Project Acronym</b>	<b>TUFFS</b>	<b>6/16/2022</b>	<b>6/19/2024</b>

<b>4.</b>	<b>Submitting Agency/state entity</b>	<b>Public Utilities Commission (PUC)</b>
<b>5.</b>	<b>Reporting Agency/state entity</b>	<b>N/A</b>

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

6. Project Objectives	8. Major Milestones			Est. Complete Date
<p><b>Objective (S1BA Section 1.5, A1)</b> Replace the Oracle Technology with a technology that will continue to be supported following August 2025. Replace Oracle Technology with a technology that is independent from Oracle.</p> <p><b>Objective (S1BA Section 1.5, B1):</b> Provide administrative rights to CD staff to absorb the work currently performed by ITSD which is not technical in nature.</p> <p><b>Objective (S1BA Section 1.5, C1):</b> Allow program staff to be able to post updated data (e.g. related to audit findings) and change their password, etc., without requiring ITSD support tickets.</p> <p><b>Objective (S1BA Section 1.5, D1):</b> Reduce the number of “buckets” into which carriers report. The existing metric requires payment into 14“buckets”. .</p> <p><b>Objective (S1BA Section 1.5, E1):</b> Maintain pre-surcharge transition carrier account transaction/payment data going back seven years as required by the CPUC retention policy.</p> <p><b>Objective (S1BA Section 1.5, F1)</b> Support</p>		Project Start		6/16/2022
	Business Process Analysis & System Requirements		6/21/2022	
	IV&V Contract Procurement		7/15/2022	
	Implementation Contract Procurement		8/29/2022	
	JAD Sessions		9/20/2022	
	Release 1 Design		4/21/2022	
	Release 2 Design		1/25/2024	
	Release 1 - Implementation		5/02/2022	
	Release 2 - Implementation		3/28/2023	
	Release 2.2 - Implementation (Jan-Dec 2015-2022)		4/08/2024	
	Project End		6/19/2024	
	Post Implementation Evaluation Report (PIER)		6/19/2025	
	M&O Project Complete		6/19/2025	
	<b>Key Deliverables</b>			
	Communication Management Plan		6/22/2022	
	Project Management & Governance Plans		6/22/2022	
	Risk & Issue Management Plans		6/22/2022	
	Project Master Schedule		2/12/2022	
	Vendor Onboard Status Report		2/15/2022	
	Organizational Change Management Plan (R1 & R2)		6/22/2022 5/23/2023	
Maintenance and Operations Plan (R1 & R2)		4/28/2024 6/20/2024		



**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

<p>allocation of revenues and adjustments to PPP funds.</p> <p><b>Objective (S1BA Section 1.5, G1):</b> Reduce the staff time spent researching and reporting status of Payments and Refunds to fee filers.</p> <p><b>Objective (S1BA Section 1.5, H1):</b> Reduce the number of carrier-originated TUFFs adjustments.</p> <p><b>Objective (S1BA Section 1.5, I1):</b> Maintain an audit log for all changes and adjustments for both carrier entries as well as business rules updates.</p> <p><b>Objective (S1BA Section 1.5, J1):</b> Enable system reporting capability to generate reports showing nonreporting/nonpaying carriers, resulting in a direct primary contact notification from that report (autogenerating a notification by the system)</p>	Release 1 - System Design	4/21/2023
	Release 2 - System Design	1/25/2024
	Test Plan (R1 & R2)	4/21/2023 11/27/2023
	Training Plan (R1 & R2)	11/27/2023 6/19/2024
	CD Final Deliverable Acceptance	6/19/2024
	Transition to M&O	6/20/2024

<b>7 Proposed Solution</b>
<p>The proposed solution for technical solution for TUFFS is to procure a cloud-based software system. This system will satisfy all business and technical requirements through technology mostly supported by an external vendor. Some tasks such as basic configuration, report development and user management will be managed by CPUC staff. Infrastructure, disaster recovery, software updates, detailed configuration/customization and advanced help desk support will be managed by the system vendor.</p>

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

*2.2. Section B: Project Contacts*

Executive Contacts					
	First Name	Last Name	Area Code	Phone #	E-mail
Director	Rachel	Peterson	415	757-7844	Rachel.Peterson@cpuc.ca.gov
Budget Control Officer	Darcey	Allen	916	894-5629	Darcey.Allen@cpuc.ca.gov
Deputy Director	Ryan	Dulin	916	894-5726	Ryan.Dulin@cpuc.ca.gov
Project Sponsor	Robert	Osborn	916	327-7788	Robert.osborn@cpuc.ca.gov
Project Director	Risa	Hernandez	415	703-2132	Risa.Hernandez@cpuc.ca.gov

Direct Contacts					
	First Name	Last Name	Area Code	Phone #	E-mail

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

Doc. prepared by/Primary Contact	Lisa	Brooks	916	906-0670	Lisa.Brooks@cpuc.ca.gov
Project Manager	Lisa	Brooks	916	906-0670	Lisa.Brooks@cpuc.ca.gov
IT Enterprise Architect	Michael	Bonner	916	823-4790	Michael.Bonner@cpuc.ca.gov
IT Lead	Karthy	Paramanathan	415	703-5246	Karthy.Paramanathan@cpuc.ca.gov

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

*2.3. Section C: Project Relevance to State and/or Departmental Plans*

1.	What is the date of your current Technology Recovery Plan (TRP)?	Date	1/2020	Project #	8660-094	
		Date	8/2013		Doc. Type	SPR 1
3.	For the proposed project, provide the page reference in your current AIMS and/or strategic business plan.	Doc.	N/A			
		Page #	N/A			
					Yes	No
4.	Is the project reportable to control agencies?				X	
If YES, CHECK all that apply:						
X	a) The project involves a budget action.					
	b) A new system development or acquisition that is specifically required by legislative mandate or is subject to special legislative review as specified in budget control language or other legislation.					
X	c) The estimated total development and acquisition costs exceed the Department of Technology's established Agency/state entity delegated cost threshold and the project does not meet the criteria of a desktop and mobile computing commodity expenditure (see SAM 4989 – 4989.3).					
X	d) The project meets a condition previously imposed by the Department of Technology.					

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

**2.4. Section D: Budget Information**

Doc. Type	SPR 1						
Budget Augmentation Required?							
No							
Yes	✓						
<b>If YES, indicate fiscal year(s) and associated amount:</b>							
	FY	2021/22	FY	2022/23	FY	2023/24	Total
		\$0		1,300,000		\$650,000	\$1,950,000.

The change is for schedule extending the project time.

**2.4 Actual Fiscal Year Associated Amounts**

**PROJECT COSTS – BCP**  
 (Communications: Broadband  
 Services: California Advanced  
 Services Fund (AB 14)  
 8660-081-BCP-2022-GB

	Fiscal Year	2021/22	2022/23	2023/24	2024/25	TOTAL
1.	Planning	\$673,669.	\$0	\$0	\$0	\$673,669.
2.	One-Time Cost	\$0	\$3,107,308.	\$1,620,663.	\$	\$4,727,971.
3.	Continuing Costs	\$0	\$46,453.	\$415,053.	\$	\$461,505.
4.	<b>TOTAL PROJECT BUDGET</b>	\$673,669.	\$3,153,761.	\$2,035,716.	\$	\$5,863,145.

Note: Rounding issue FAW: Future OPS reduced by \$1

5.	Cost Savings/Avoidances	\$0	\$0	\$0	\$0	\$0	\$0
6.	Revenue Increase	\$0	\$0	\$0	\$0	\$0	\$0

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

*2.5. Section E: Vendor Project Budget – Actual from July 2023- May 2024*

Project #	8660-094
Doc. Type	SPR 1

Vendor Cost for SPR 1 Development (if applicable)	N/A
Vendor Name	Global Technologies Inc.

<b>VENDOR PROJECT BUDGET</b>					
7.	Fiscal Year	2021/22	2022/23	2023/24	TOTAL
8.	Primary Vendor Budget	\$0	\$621,489.	\$705,511.	\$1,327,000.
9.	Oversight Budget	\$0	\$64,498.	\$73,502.	\$138,000.
10.	IV&V Budget	\$0	\$149,580.	\$114,970.	\$264,550.
11.	Project Management	\$0	\$0	\$0	\$0
12.	Procurement & BA Support (IT Licensing & Support)	\$0	\$161,358.	\$198,296.	\$359,654.
13.	<b>TOTAL VENDOR BUDGET</b>	<b>\$0</b>	<b>\$996,925.</b>	<b>\$1,092,279.</b>	<b>\$2,089,204.</b>

**PRIMARY VENDOR HISTORY SPECIFIC TO THIS PROJECT**

Primary Vendor	Global Touchpoints
Contract Start Date	June 16, 2022
Contract End Date (projected)	June 12, 2025

**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

<b>Amount</b>	<b>\$1,327,000.</b>
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**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION E: VENDOR PROJECT BUDGET**

**PRIMARY VENDOR CONTACTS**

<b>Vendor</b>	<b>First Name</b>	<b>Last Name</b>	<b>Area Code</b>	<b>Phone #</b>	<b>Ext.</b>	<b>Area Code</b>	<b>Fax #</b>	<b>E-mail</b>
Global Touchpoints Inc.	Sundara K	Gopalakrishnan	916	878-5948				sk@touchpointsinc.com
Global Touch Points Inc	Apoorv	Kishore	916	752-0384				apoorv.kishore@touchpointsinc.com
Global Touch Points Inc	Swati	Khandelwal	510	786-7978				swati.k@touchpointsinc.com
Global Touch Points Inc	Kiran	Kumar	916	752-0384				kiran.kumar@touchpointsinc.com



**INFORMATION TECHNOLOGY PROJECT SUMMARY PACKAGE**

**SECTION F: RISK ASSESSMENT INFORMATION**

Project #	8660-094
Doc. Type	SPR 1

**2.6. RISK ASSESSMENT**

	Yes	No
Has a Risk Management Plan been developed for this project?	X	

**General Comment(s)**

Preliminary risks for this project have been identified, captured, and discussed. The highest priority risks will be escalated as needed for resolution. The Risk Management Plan was updated when all parties were on board and updated on an ongoing basis. The project is using a risk process as documented in the approved Risk Management Plan. That risks are identified, reviewed weekly, mitigated, and escalated as needed asdescribed in the project Risk Management Plan.

### 3. Proposed Project Change

#### 3.1. Project Background/Summary

Telecommunications User Fee Filing System (TUFFS), will provide a fully integrated standard, enterprise-wide technology platform using a common architecture and strategy to automate the electronic intake, routing, tracking, disposition, and status of documents (such as carrier reporting Surcharge Access Lines, and User Fee submissions, adjustments and credit requests,, and carrier compliance reports) and the electronic submission of financial payments by regulated entities will be recorded and applied to each carrier account visible for Carrier and CPUC staff. By replacing current systems and processes that are cumbersome and paper-driven, the TUFFS platform will enable the PUC to better protect public safety, promote reliable utility service, and increase transparency to the Carrier, while improving business processes and transparency within the PUC.

##### 3.1.1. Key Historical Dates

Estimated Project Schedule, Cost, and Criticality Rating				Project Number 8660-094
Project Schedule		Project Costs		Funding Source(s)
Start Date:	06/13/2022	Planning Costs	\$673,669	Special Funds
End Date:	09/21/2023	One-Time Costs	\$3,664,228	
		Future Ops, IT Staff & OE&E Costs	\$1,585,823	
PIER:	09/21/2024	<b>Total:</b>	<b>\$5,923,720</b>	
		Annual M&O	\$507,874	
Criticality Rating:	Med	Complexity Zone:	II	

Figure 1: PAL Approval: Estimated Project Schedule, Cost and Criticality Rating by IPOC

#### 3.2. Project Status

Following is the status and recent activities pertaining to this project:

Telecommunication and User Fee Funds System (TUFS) *Special Project Report***Current Sponsor**

- Robert Osborn  
Communications Division Director

**Recent Activities**

- On 11/9/2022- During TUFFS weekly meeting a Project Decision was made and approved 11/9/2022: GTP Contract 79928 Amendment 1 Go Live date changed from January 30, 2023, to February 17, 2023
- On 12/15/22 meeting- The business had an internal discussion, today, on the topic and we decided to retain the 2010-2014 data as well as consider migrating it to the new TUFFS.
- On 1/17/2023 business considering mandatory optional with additional data migration years CR#7 2010-2014 pending schedule impacts.
- On 2/12/2023 business decision to seek additional support on Electronic Financial Transaction Portal connected to TUFFS to assist carriers' payment processing. Deployment 4/27/2023
- On 4/28/2023 ISO Scanning for SQL queries discovered 3 high risk factors, although resulting in false positives verified with Salesforce Case# 44531942/Salesforce Security Assessment Team delayed Go Live from 5/1 to 5/2/2023.
- On 5/2/2023 TUFFS PH I Go Live
- TUFFS Schedule anticipated PH II beginning in July, however CD will not move forward to PH II while PH I have Critical, Major, and Serious bugs that remain open.
- On 8/16/2023 PH II Kickoff – Requirements Review. CD Agreed to begin PH II in parallel with the completion of PH I Critical, Major and Serious bugs that remain open to not further prevent schedule delays.
- On 9/15, 2023 MTS - legacy data for 2016-2019 has a different calculation and reporting process for approx. 100 carriers – CR#19 created to support request – cost decision TBD.
  - All 2016-2019 NON-MTS data will be migrated in Salesforce contract 79928A2.
- On 10/30/2023 TUFFS PH I DSD updated to include PH II DSD 11/13 approved by ITSD and TUFFS Team
- On 12/8/2023 TUFFS Letterhead changed on Email notification Banner (Internal and External) GTP implemented across all Salesforce notifications.

Telecommunication and User Fee Funds System (TUFS) *Special Project Report*

- On 11/20/2023 CR#21 created, and CD identified it is no longer needed since the screen view is being updated in User Story
- On 11/29/2023 CR#22 was created, and the CD identified that it is not needed since the screen view is being updated in User Story with manual process needed by ITSD on a case-by-case basis.
- On 12/4/2023 Conga 3<sup>rd</sup> party application used for TUFFS .pdf document/ editable templates begin development 7 priority templates logged in JIRA TUF-2306
- On 1/5/2023 Decision: Since the current paper process will remain in place to support the Credit and Refund process for legacy reporting periods, there will not be any changes to the Credit/Refund underlying functionality in the salesforce TUFFS solution. (8 User Stories related – 5 rejected)
- On 2/1/2024 Enterprise-level data migration TUFFS PH 2 will be a 2-part release for data migration R1 – Q1 2023 (Jan-Mar) and R2 January 2015 – December 2022.
- On 2/20/2024, CD reviewed cost worksheets for implementation and annual maintenance and will not pursue CR#7 or CR#19. Will keep legacy TUFFS online for carrier and staff access to 2010-2014 data and staff access to MTS data. In January 2026, ITSD archive plan will be implemented making the data available only through reports in Tableau by internal staff; at which point, carriers will have to request data for these periods through CD Surcharge Team.
- Ph I deliverables still need to be completed by GTP and approved by CD. Final PH I deliverables completed in agreement with CD 4/28/2024. PH I closed out.
- PH I and PH II bugs continue to be resolved by GTP.
- 3/13/2024 Carriers are no longer reporting or reviewing any legacy Data Jan 2015- Mar 2023
- 3/29/2024 PH II Go Live Release 1 (2023 Q1 JAN-MAR)
- 4/11/2024 PH II Go Live Release 2 Data Migration (2015-2022)
- 4/18/2024 Critical, Major, and Serious bugs that remain open, Data migration mapping in Salesforce does not match Legacy TUFFS reporting. Label added to bugs that have been identified as Data Migration Related. 1. Reporting amount for payments does not match legacy reported carrier data 2. Calculation penalty Interest on Surcharge is not calculating indirect and direct revenue correctly 3. Adjustment Data not migrated in Go Live R1 or R2. 4.



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Reports not accurately showing payment amount made by carrier and revenue type on Surcharge and User Fee History detail report used by surcharge team and Transaction Detail Report used by CD and Fiscal for Daily carrier reconciliation between TUFFS, Fiscal, and Fiserv (Bank electronic funds transfer).

- 5/10/2024 with data migration reported issues that remain after Go Live R2 schedule time has been provided to correct the data migration issues related to Critical, Major, and Serious. SPR Updated from 5/15 to 6/15 to allow the data migration issues and the final 3 deliverables to be resolved.

**Expenditures to Date:**

TUFFS Variance Table				
	PAL Stage Gate 4 Approved Budget (\$)	SPR 1 Actuals Through <b>May 2024</b> Budget (\$)	Variance	Reason for Change
<b>IT Project Costs (One-Time)</b>				
Staff (Salaries & Benefits)	<b>1,602,123</b>	<b>2,298,296.</b>	<b>-696,173.</b>	Project active through June 2024
Staff OE&E Rollup (Gen. Exp.; Printing, Comm.; Postage; Ins.; Travel – In/Out of State; <b>Training</b> ; Fac. Ops.; Utilities)	<b>16,000.</b>	<b>16,000.</b>	<b>0</b>	ESSR 23ITS1114 ITSD Salesforce Training
Consulting & Prof. Services: Interdepartmental	<b>138,000.</b>	<b>138,000.</b>	<b>0</b>	Expected to begin M&O 2024/2025
Consulting & Prof. Services: External	<b>1,593,000.</b>	<b>1,916,021.</b>	<b>-323,021.</b>	Deliverable all encumber in Contracts
Consolidated Data Centers	<b>0</b>	<b>0</b>	<b>0</b>	N/A
Information Technology	<b>315,105.</b>	<b>359,653</b>	<b>-44,548</b>	Shared IT Project costs with all Salesforce applications TCP, eCAP, TUFFS M&O 23/324 reduced to one month absorbed M&O costs Line-308 FAW - Conga added by CD for USPS Mailer and email notification



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Misc. OE&E Rollup (Dept. Services; Central Admin. Services; Office Equip.; Other; Unclassified/Special Adjustment; Local Assistance)	0	0	0	No Change
<b>Total IT Project Costs (One-Time):</b>	<b>3,664,228.</b>	<b>4,727,970.</b>	<b>-1,063,742.</b>	BCP 8660-081- BCP-2022-GB
<b>Future Operations IT Staff and OE&amp;E Costs (Continuing)</b>				
Staff (Salaries & Benefits)	1,081,102.			<b>Not entered M&amp;O 6/19/2024</b>
Staff OE&E Rollup (Gen. Exp.; Printing, Comm.; Postage; Ins.; Travel – In/Out of State; Training; Fac. Ops.; Utilities)	0	0	0	N/A
Consulting & Prof. Services: Interdepartmental	0	0	0	N/A
Consulting & Prof. Services: External	0	0	0	N/A
Consolidated Data Centers	0	0	0	N/A
Information Technology	504,721	0	0	Based on updated FAW Actuals the technology cost reduced to 236,886
Misc. OE&E Rollup (Dept. Services; Central Admin. Services; Office Equip.; Other; Unclassified/Special Adjustment; Local Assistance)	0	0	0	
<b>Future Operations IT Staff and OE&amp;E Costs (Continuing):</b>	<b>1,585,823.</b>	<b>0</b>	<b>0</b>	
<b>TOTAL:</b>	<b>5,250,051.</b>	<b>4,727,970.</b>	<b>522,081.</b>	Total does not include planning costs 21/22 \$673,669. Actuals totals does not include M&O

**Note: Rounding issue FAW: Future OPS reduced by \$1**

### 3.3. Reason for Proposed Change

#### 3.3.1. Extend Timeline

After the Go Live Phase I, many screens and functionality bugs were still reported as Critical, Major, and Serious. The Contract 79928 requires a 45-day sustainment period and since these bugs were still open and working, Carrier External training tutorials were not completed for functions in production and the internal User Guide was still in progress due to the bugs that needed screen and function updates. The business did not feel comfortable releasing PH I into sustainment and instead requested that sustainment begin once the Critical, Major, and Serious bugs were completed and verified by CPUC. As the testing continued, progress was made to reduce the bugs, Critical, Major, and Serious bugs remaining in PH I functions and application screens. In July 2023, TUFFS reached the over 10% threshold on the project and the schedule would need to be extended. IPOC, provided allowance for TUFFS to informally extend an additional month due to pushing PH II start back based on request for schedule change only and no cost impact issues. On August 16, 2023, the Project team held the PH II Kickoff and allowed the open bugs from sustainment to continue in parallel with the start of PH II. Also, CD agreed to begin JAD sessions and requirement review. However,

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this put TUFFS at 30% variance in schedule approved by CDT and it was discussed in the JAD sessions that more User Story implementation and bug resolution was needed to build PH I than was anticipated in original project scope.

## History of Original Cost

Initial costs and durations were derived primarily from two RFIs that were done – one in 2019 and one in 2021. The first RFI is based schedule on an Oracle Applications architecture and the relative number of requirements as compared to the TCP sister projects (eCAP and TUFFS platform). The 2019 RFI focused only on eCAP but was based on a cloud-based architecture (Salesforce was ultimately chosen). TUFFS costs were then updated to maintain the same ratio of schedule between eCAP and TUFFS as were established in the 2021 costing. No changes were made to Cost on TUFFS implementation.

Three key areas were not anticipated in the update of the TUFFS costs: divisional uniqueness, separate data processes and business rules in collaboration between multiple CPUC Divisions, and Carrier notifications and Internal staff notifications in application and by email.

## Technical and Functional Reasons delay in schedule.

- **Divisional Uniqueness**  
While the core mission of the CPUC is to regulate utilities, the way such regulation occurs differs between industries. Laws, Federal assistance, and Commission decisions cause business rules to diverge between transportation, water, energy, and communications divisions. This results in a unique set of functions that must be developed for any business process automation. With a new cloud-based architecture, some common functions can exist such as secure logins, basic user roles (e.g., management, staff, external users), CPUC logo and general look and feel. But, because of the unique business rules of each division, the CPUC overestimated the amount of code reuse from the eCAP project that could be leveraged in TUFFS. This resulted in more developer time needed to satisfy some of the unique requirements for TUFFS.
- **Separate Data processes**  
Additional change requests needed to satisfy the workflow and notification of different departments at different stages of an approval process e.g., Primary Carrier Contact reviewed and approved through Licensing and Compliance (L&C) unit ensuring licensing and active status of Telecommunications carrier, Secondary Contact managed as an alternate through Surcharge unit, and Complaint Contact reported to Consumer Affairs Branch (CAB) tracked in their separate application Consumer Complaint Tracking System (CCT). They require notifications of any changes reported by carrier to L&C unit that tracks all telco carrier activity in UCS application and TUFFS is the system to ensure L&C and CAB separate systems match.
- **TUFFS application User Interface (UI) Screens and Reports**  
TUFFS was initially designed to automate the Telecommunications Carrier reporting and payment remittance processing functions of the Public Purpose Programs (PPP). CPUC discovered that the business rules and separate email notifications previously used outside legacy application infrastructure did not have the communication for workflow actions between units and caused delay in processing carrier requests and communications between carrier and internal staff and workflow. This prompted detailed updates to application screens, enriching the carrier and internal staff user experience to capture the information provided and status clearly. The carrier has the ability to submit



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the requests, add attach supporting documentation for action directly into their carrier profile and this is immediately communicated via email notification to the internal staff. The carrier also has the ability to submit a Credit and refund request and the CPUC notification history which was not available in legacy and the new internal workflow processes will ease transition and status updates to the carrier request in real time. The carriers and internal staff have single login access to Salesforce when previously multiple logins were required to access data. Old methodology reported using revenue information. New methodology to report surcharge and fees based on revenues and number of access lines. This added a level of process complexity with the expansion from 7 programs to 14 programs to be collected in the system.

Twenty-One new custom reports created in PH II for the management and reconciliation of the 14 legacy program data. Third party application Conga was needed based on requirement to have modifiable pdf notifications templates for telco carrier compliance. Conga Composer and Triggering licensing is needed for building customizable .pdf templates in project requirements. Conga is also used for triggering emails to carriers for reporting and payment remittance compliance notifications.

### 3.4. *Proposed Project Change*

- This SPR is necessary only for extension in schedule. Cost and scope are within the approved Stage 4 baseline. The project's duration has changed for the reasons specified above in 3.3.1. To support these changes, CPUC proposed a new iterative release of the functionality. The project will be split into two major phases. Phase 1 duration will be one year (June 2022 – July 2023). Phase 2 (Aug 2023 – June 2024).
- Phase 2 is broken into two releases:
  - Release 1 (R1) - Q1 2023 -JAN-MAR 2023 Legacy Data migration
  - Release 2 (R2) - JAN 2015 – DEC 2023 Legacy Data migration
- Due to the delay in schedule in Ph I (See 3.3.1 Extended Timeline) the project was expected to take sixteen months and was extended due to scheduling delays. The final duration will be increased to 24 months:
- Phase 1 (June 2022 – July 2023)
  - Critical, Major, and Serious bugs prevent the project entering sustainment
  - Carrier profile data migration (Primary, Secondary, Contact)
  - Carrier login changed from multiple logins to one account to 1:1 login email account.
  - Allocate payment reporting and remittance across all PPPs calculation.
  - Carrier Primary Regulatory Contact Update Form (In App)
  - Connect the Carrier Electronic File Transaction (EFT) portal from US Bank and Fiserv payment process to report in Salesforce under unique Zero Balance account and company ID.
  - Update carrier screens for payment instructions to Carriers on reporting payment pre



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202204 and post for new Salesforce solution and separation from Legacy payments.

- Carrier Primary Regulatory Contact workflow approval between different departments
- Accounts Receivable noncompliance reports and notifications
- Adjustments processes workflow reports and notifications
- Refund/ Credit Request workflow reports and notifications.
- Phase 2 (Aug 2023 – June 2024)
  - R1
    - Q1 2023 JAN-MAR TUFFS Oracle Legacy Data Migration
  - R2
    - TUFFS Oracle Legacy Data Migration 2015-2023 carrier data to Salesforce
    - Customizable .pdf Citation notices and attachments to Carriers
    - Critical, Major, and Serious bugs prevent the project entering sustainment.

### 3.4.1 Accessibility

This section is unchanged from the approved Stage 4.

### 3.4.2 Impact of Proposed Change on Project

All proposed Change Requests in Phase 2 have been calculated at no additional cost and will not be added to the Phase 2 schedule these will continue development and testing in M&O. Overall duration of the project schedule was extend to 24 months, pushing the end date out by 9 months, and with no additional cost. CPUC is absorbing project staff cost for the extra time. Actuals show currently under budget for staff costs. The imposed change on the project extension decreased the M&O cost for 23/24 covered the minor increase in IT licensing. The project budget is within the approved Stage 4 baseline.

### 3.4.3 Feasible Alternatives Considered

Two alternatives were considered for Phase 2:

- Deliver 1 release in Phase 2 that included 2015-2023 legacy data.

This alternative was rejected because the CPUC was concerned that the amount of time to migrate all the 8 years of data would take to long resulting in Carriers not being able to report and remit surcharges and user fees, for the current year. This would cause carriers to accrue interest and crate a negative impact on the Telecommunication Carriers. This would have also resulted in the CPUC not being able to fund the Public Purpose Programs for the residents of the State of California.
- Deliver 2 separate data releases for Phase 2

This alternative was chosen because it would split the 8 years of data into smaller sets of data, Release 1 for Q1 2023 Data and Release 2 for 2015 – 2022 data. Completing Release 1 would enable the carriers to continue to report and remit surcharges and user fees for the current year, thus removing the



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occurrence of accruing negative interest.

### 3.4.4 Implementation Plan

Details of how the project will implement TUFFS are in the project schedule. A summary of CPUC’s implementation plan for the TUFFS project includes:

- Update stakeholder information to reflect the two releases and when the stakeholders will become involved.
- Complete and submit SPR1 based on the project interval between PH I and PH II increasing the duration from 16 months to 24 months.
- Ensure the system integration develops a design that is traceable to all requirements.
- Oversee the development of TUFFS software.
- Test and Deploy TUFFS according to the schedule.
- Support all Organizational Change Management (OCM) and training needs.

## TUFFS Solution Architecture

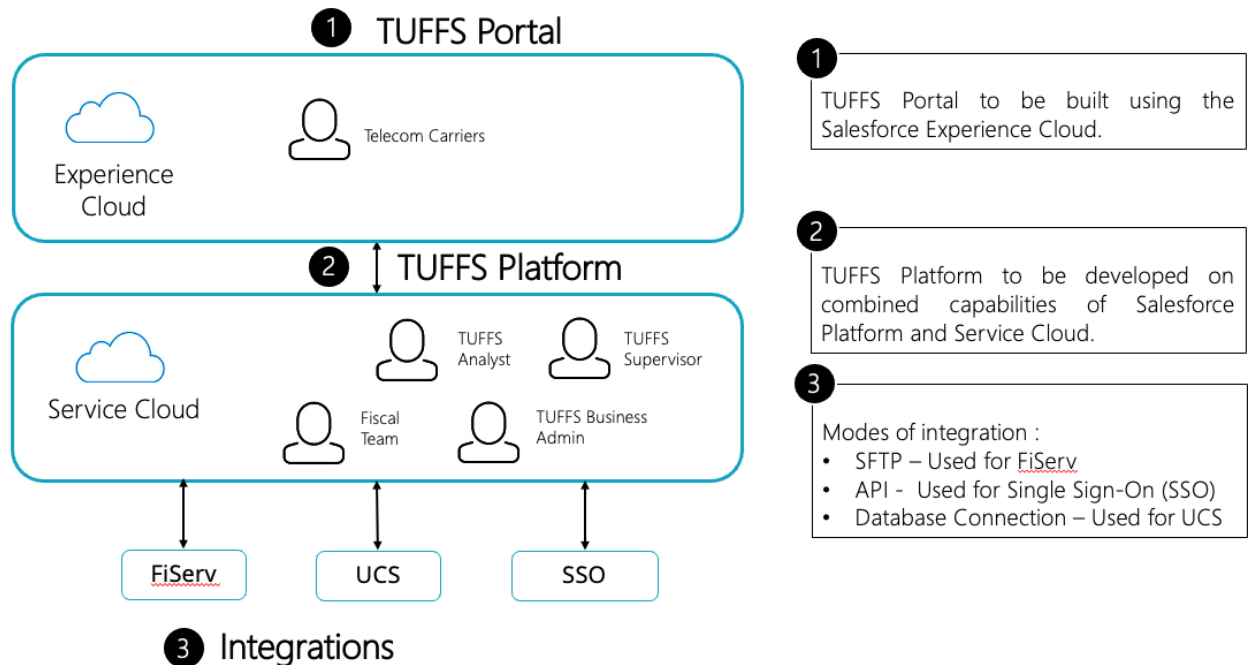


Figure 2: TUFFS Solution Architecture



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## 4. Updated Project Management Plan

TUFFS project will be leveraging the TCP project planning documents. There are now 10 PMP documents as follows:

- Project Management Plan
- Change Control Management Plan
- Schedule Management Plan
- Communication Plan
- Governance Management Plan
- Risk Management Plan
- Issue Management Plan
- Implementation Management Plan
- Governance Management Plan
- Maintenance and Operations Transition Management Plan

### 4.1. *Project Manager Qualifications*

This section is unchanged from the approved from Stage 4.

### 4.2. *Project Management Methodology*

This section is unchanged from the approved from Stage 4.

### 4.3. *Project Organization*

The project organization has changed since the project began. Notably, the Project Executive Steering Committee (ESC) and Change Advisory Board (CAB) have vacancies for Network Infrastructure, CTO, CIO and all have been assigned to one person for approval Deputy Director Ryan Dulin as shown in Figure 3: TUFFS Project Organization below.



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**TUFFS Functional Org Chart**

Rev 8/16/2023

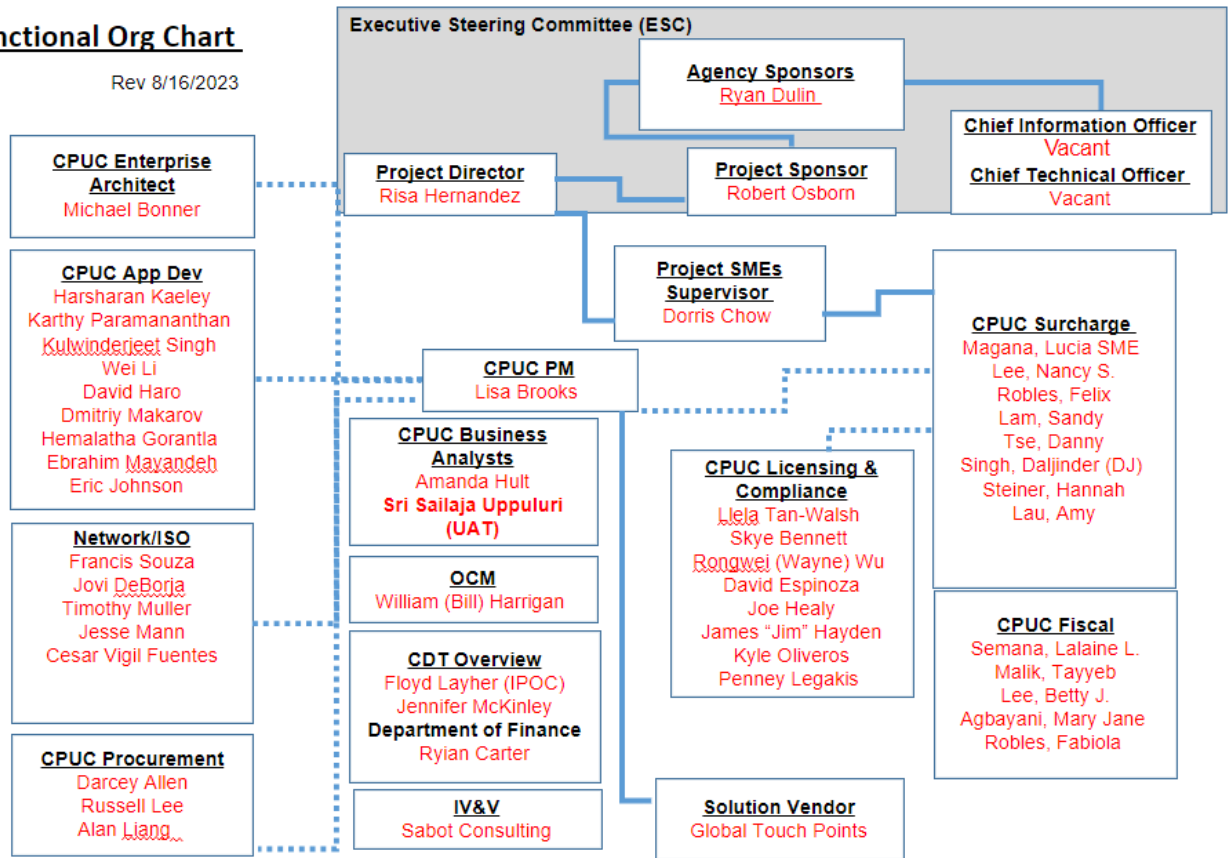


Figure 3: TUFFS Project Organization



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### 4.4. Project Priorities

Below is the project trade-off matrix. The ratings indicate the degree of priority in each of the key areas of the project with 1 being highest and 4 being lowest in priority. This matrix is used to assist in guiding decisions made about the project. These priorities were re-evaluated by the Project Sponsor for this SPR.

**Phase 1.**

Schedule	Scope	Resources	Quality
1	3	4	2

**Phase 2.**

Schedule	Scope	Resources		Quality
4	3	2		1

### 4.5. Project Plan

#### 4.5.1. Project Scope

Telecommunications User Fee Filing System (TUFS) scope includes providing a fully integrated standard, enterprise-wide technology platform using a common architecture and strategy. To automate the workload and increase capability of legacy applications (Oracle Forms). To improve process efficiency, and to increase data accuracy by reducing manual and paper processes previously causing human errors and delays.

The project will be split into two major releases. Release 1 duration will be one year. Release 2 duration will be about 12 months – starting about 45 days prior to the completion of Release 1. In total, the project is expected to take about two years:



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- Release 1 (12 months)
- Release 2 (12 months)

#### **4.5.2. Project Assumptions**

The TCP and eCAP/PMCS project(s) provided a proof of concept for Salesforce cloud solution that will be leveraged by TUFFS.

#### **4.5.3. Project Phasing**

The TUFFS project will use Waterfall as the default methodology as depicted in various phases of the Project Management Life Cycle in Figure 4. Each of the two releases will follow this phased approach of Design → Development → System Test, if necessary. Furthermore, if each release may have sub-iterations. For example, Release 1 may be split into applications function and reporting, and Release 2 would build on Release 1 functions.



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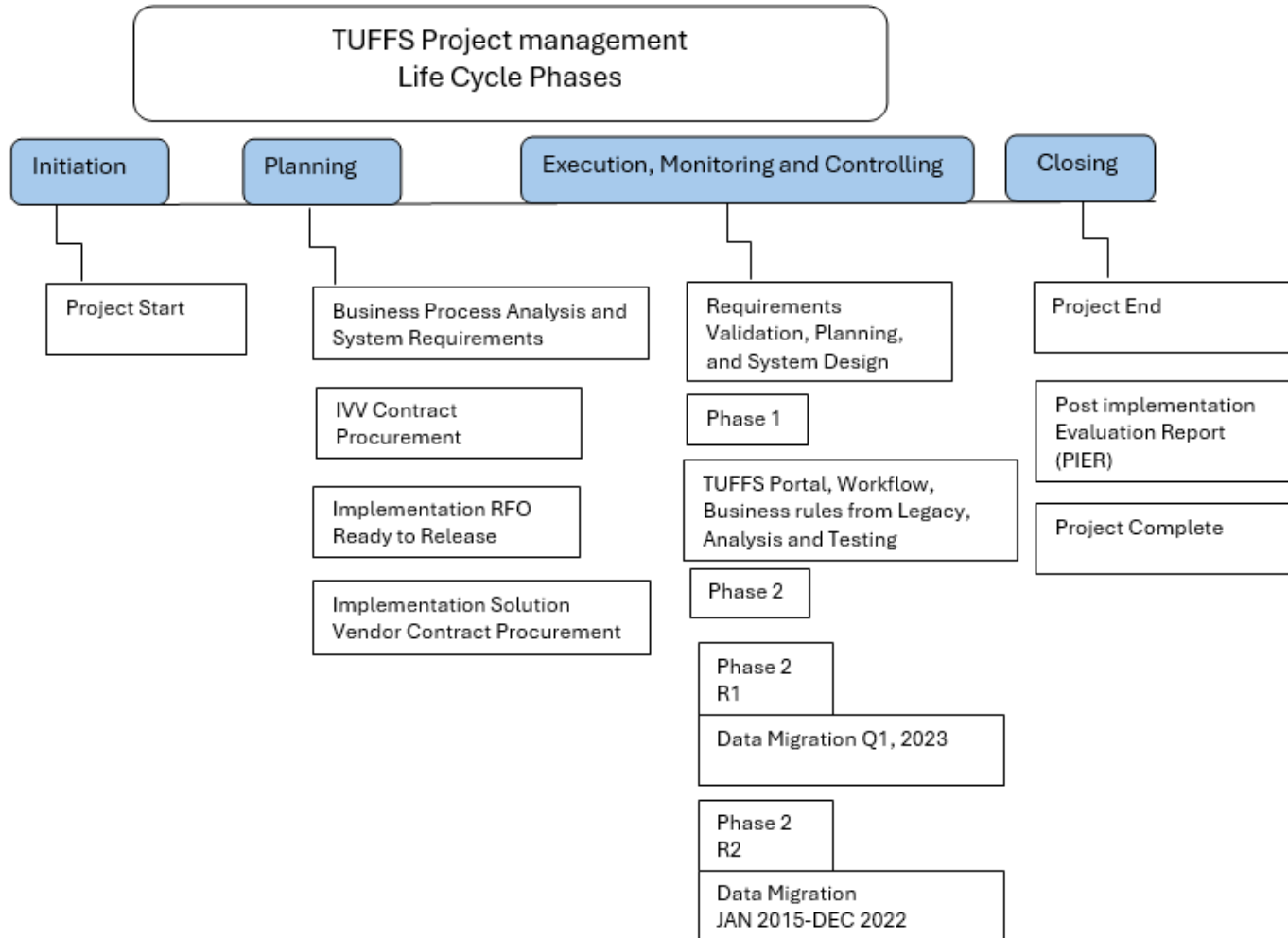


Figure 4: TUFS Project Management Live Cycle Phases





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#### **4.5.4. Project Roles and Responsibilities**

This section is unchanged from the approved Stage 4; however, some positions are now vacant (CIO, CTO) and have been consolidated into the Executive Deputy Directors role.

#### **4.5.5. Project Schedule**

Below is a project high-level schedule reflecting major milestones.



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<b>% Complete</b>	<b>Task Name</b>	<b>Duration</b>	<b>Start</b>	<b>Finish</b>
<b>84%</b>	<b>Telecommunications &amp; User Fee Filing System - Project Schedule</b>	<b>757 days?</b>	<b>Wed 6/15/22</b>	<b>Tue 6/3/25</b>
<b>100%</b>	<b>Global Touchpoints Contract Execution</b>	<b>1 day</b>	<b>Wed 6/15/22</b>	<b>Wed 6/15/22</b>
<b>94%</b>	<b>Phase 1 - Implementation</b>	<b>719 days</b>	<b>Thu 6/16/22</b>	<b>Fri 4/11/25</b>
<b>100%</b>	<b>1. Review business process/report and Kickoff Meeting</b>	<b>42 days</b>	<b>Thu 6/16/22</b>	<b>Fri 8/12/22</b>
<b>100%</b>	<b>2. Project Management Plan</b>	<b>222 days</b>	<b>Thu 7/7/22</b>	<b>Tue 5/23/23</b>
<b>99%</b>	<b>3. System Configuration and Design</b>	<b>133.75 days</b>	<b>Mon 7/25/22</b>	<b>Mon 2/6/23</b>
<b>100%</b>	<b>4. System Test Scripts</b>	<b>135 days</b>	<b>Fri 10/21/22</b>	<b>Mon 5/8/23</b>
<b>100%</b>	<b>5. Development of Solution</b>	<b>148.95 days</b>	<b>Mon 8/29/22</b>	<b>Mon 4/3/23</b>
<b>100%</b>	<b>6. Testing</b>	<b>71 days</b>	<b>Wed 1/11/23</b>	<b>Fri 4/21/23</b>
<b>100%</b>	<b>7. TUFS Legacy Data Migration</b>	<b>140.3 days</b>	<b>Fri 10/21/22</b>	<b>Tue 5/16/23</b>
<b>100%</b>	<b>8. Deployment</b>	<b>102.95 days</b>	<b>Fri 4/21/23</b>	<b>Thu 9/14/23</b>



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<b>100%</b>	<b>9. Knowledge Transfer</b>	<b>100 days</b>	<b>Wed 4/19/23</b>	<b>Thu 9/7/23</b>
<b>100%</b>	<b>10. End-user Training</b>	<b>20 days</b>	<b>Tue 5/2/23</b>	<b>Mon 5/29/23</b>
<b>59%</b>	<b>11. Warranty</b>	<b>12 mons</b>	<b>Tue 5/30/23</b>	<b>Thu 5/9/24</b>
<b>59%</b>	<b>12. Maintenance and Operations Support</b>	<b>12 mons</b>	<b>Wed 5/8/24</b>	<b>Fri 4/11/25</b>
<b>69%</b>	<b>Phase 2 - Implementation</b>	<b>522.75 days?</b>	<b>Thu 5/18/23</b>	<b>Tue 6/3/25</b>
<b>100%</b>	<b>13. Review business process/report and Kickoff Meeting</b>	<b>94.5 days</b>	<b>Thu 5/18/23</b>	<b>Fri 9/29/23</b>
<b>100%</b>	<b>14. Project Management Plan</b>	<b>194.25 days</b>	<b>Thu 5/18/23</b>	<b>Mon 2/26/24</b>
<b>99%</b>	<b>15. System Configuration and Design</b>	<b>82.25 days</b>	<b>Wed 8/16/23</b>	<b>Wed 12/13/23</b>
<b>100%</b>	<b>16. System Test Scripts</b>	<b>96.75 days</b>	<b>Thu 11/2/23</b>	<b>Mon 3/25/24</b>
<b>95%</b>	<b>17. Development of Solution</b>	<b>105 days</b>	<b>Thu 11/2/23</b>	<b>Fri 4/5/24</b>
<b>100%</b>	<b>18. Testing</b>	<b>54 days</b>	<b>Wed 1/10/24</b>	<b>Thu 3/28/24</b>
<b>92%</b>	<b>19. TUFFS Legacy Data Migration (Original Scope - Last 8 years)</b>	<b>75 days</b>	<b>Thu 1/25/24</b>	<b>Fri 5/10/24</b>



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<b>60%</b>	<b>20. Deployment of Solution</b>	<b>87.75 days</b>	<b>Thu 2/15/24</b>	<b>Wed 6/19/24</b>
<b>0%</b>	<b>20.1 Create Transition Plan</b>	<b>2 wks</b>	<b>Fri 4/26/24</b>	<b>Fri 5/10/24</b>
<b>0%</b>	<b>20.2 Create Release Plan</b>	<b>1 wk</b>	<b>Fri 5/10/24</b>	<b>Fri 5/17/24</b>
<b>68%</b>	<b>20.3 Deployment Activities</b>	<b>93.75 days</b>	<b>Thu 2/15/24</b>	<b>Thu 6/27/24</b>
<b>100%</b>	<b>Non-functional Testing</b>	<b>10.5 days</b>	<b>Thu 3/14/24</b>	<b>Thu 3/28/24</b>
<b>100%</b>	<b>ADA Testing</b>	<b>26 days</b>	<b>Fri 2/23/24</b>	<b>Mon 4/1/24</b>
<b>100%</b>	<b>Establish Go/No-Go Criteria</b>	<b>2 wks</b>	<b>Thu 2/15/24</b>	<b>Fri 3/1/24</b>
<b>100%</b>	<b>Go/No-Go Decision</b>	<b>1 day</b>	<b>Fri 3/29/24</b>	<b>Mon 4/1/24</b>
<b>100%</b>	<b>Deploy accepted code to production alongside CPUC</b>	<b>2 days</b>	<b>Wed 3/27/24</b>	<b>Fri 3/29/24</b>
<b>100%</b>	<b>Perform Smoke Test (GTP)</b>	<b>1 day</b>	<b>Fri 3/29/24</b>	<b>Mon 4/1/24</b>
<b>100%</b>	<b>Perform Smoke Test (CPUC)</b>	<b>1 day</b>	<b>Mon 4/1/24</b>	<b>Tue 4/2/24</b>
<b>100%</b>	<b>Go-Live - with 2023 Q1 Data</b>	<b>0 days</b>	<b>Tue 4/2/24</b>	<b>Tue 4/2/24</b>
<b>100%</b>	<b>Go-Live - with 2015 to 2022 Q4 Data</b>	<b>1 day</b>	<b>Thu 4/11/24</b>	<b>Thu 4/11/24</b>



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48%	<b>Production Stabilization</b>	45 days	Thu 4/11/24	Thu 6/13/24
0%	<b>Transfer source code to CPUC</b>	1 wks	Fri 5/20/24	Thu 6/13/24
6%	<b>21. Knowledge Transfer</b>	20 days	Mon 5/13/24	Fri 6/10/24
0%	<b>22. End-user Training</b>	22.5 days	Mon 5/20/24	Wed 6/19/24
8%	<b>23. Warranty</b>	13 mons	Fri 4/12/24	Tue 4/15/25
8%	<b>24. Maintenance and Operations Support</b>	12 mons	Thu 6/20/24	Tue 6/20/25

Figure 5: TUFFS Project Schedule 20240430 - Full schedule is available for review upon request Highlighted items are the project tasks that remain to be completed.

#### 4.6. Project Monitoring and Oversight

This section is unchanged from the approved Stage 4.

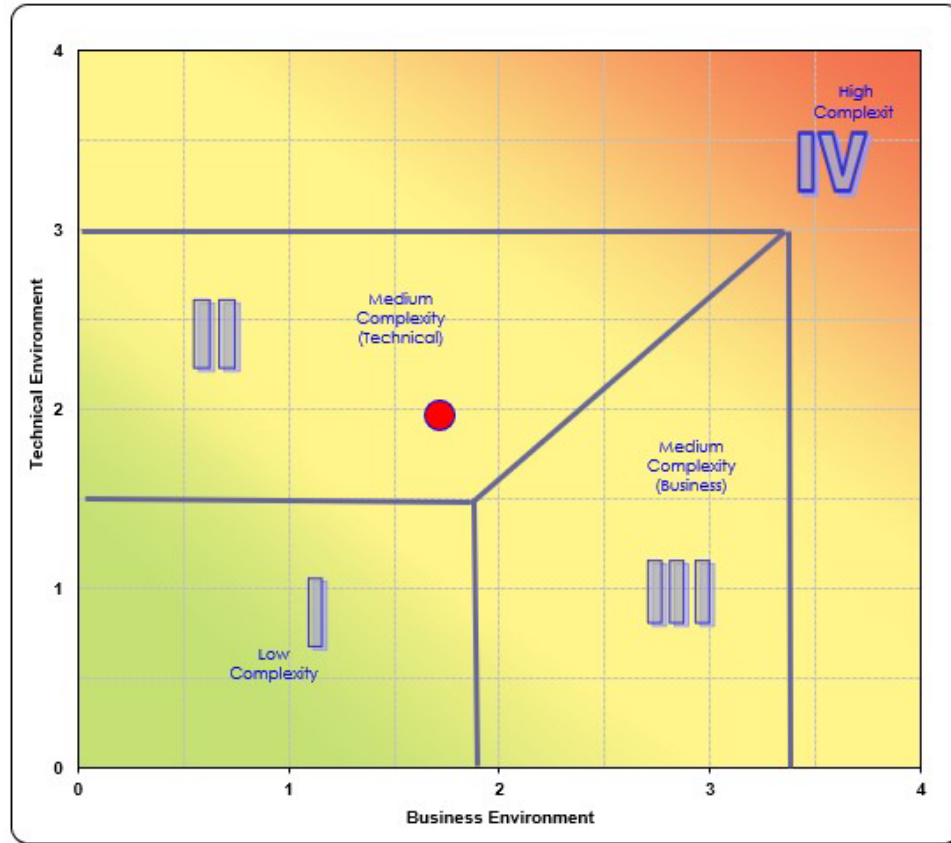


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**Complexity Diagram**

**Instructions:** Plot your project in the appropriate complexity zone.

*[Note: Your project will be plotted automatically in this worksheet, using the values computed in the previous tables.]*



<i>Scores</i>	<b>Business Complexity</b>	<input type="text" value="1.7"/>
	<b>Technical Complexity</b>	<input type="text" value="2.0"/>

Figure 6: Project Complexity Diagram – Medium Complexity Project.



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#### ***4.7. Project Quality***

This section is unchanged from the approved from Stage 4.

#### ***4.8. Change Management***

This section is unchanged from the approved from Stage 4.

#### ***4.9. Authorization Required***

N/A



## **5. Updated Risk Management Plan**

This section is unchanged from the approved Stage 4.

### *5.1. Risk Register*

TUFFS Risk Register Logged in Jira under Risks and Issues

## **6. Financial Analysis Worksheets (FAWs)**

### *6.1. Original FAWs Stage 4*

The following pages contain FAWs.

*Refer to the attached FAW*





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