

REQUEST UNDER THE ILLINOIS FREEDOM OF INFORMATION ACT

February 11, 2019

Office of the Governor of Illinois
ATTN: FOIA Officer
JRTC, 100 West Randolph, Suite 16-100
Chicago, IL 60601
Via Email: Georgia.Man@illinois.gov

Re: Certain records related to U.S. Climate Alliance

To Whom it May Concern:

On behalf of Energy Policy Advocates, recognized as a non-profit public policy institute under § 501(c)(3) the Internal Revenue Code, please consider this request pursuant to the Illinois Freedom of Information Act, 5 ILCS 140 *et seq.* please provide us within the statutorily permitted period of time copies of the following records, and their *accompanying information*,¹ including also any attachments: all correspondence of Anne Caprara and/or Pat Collier, which are also to or from aimee.Barnes@gov.ca.gov, amccabe@theclimateregistry.org, and/or any party using an email ending with @climatenexus.org, @hewlett.org, @usclimatealliance.org, or @unfoundation.org.

Records responsive to this request will have been dated from January 1, 2019 through the date you process this request, inclusive

These terms are not case sensitive.

Please provide records in electronic format and to the email used to transmit this request.

¹ See discussion of SEC Data Delivery Standards, *infra*.

Please consider as responsive entire email “threads” containing any information responsive to this request, regardless whether any part of that thread falls outside the cited search parameters.

Given the nature of the records responsive to this request, all should be in electronic format, and there should be no photocopying costs.

If your Office expects to seek a charge associated with the searching, copying or production of these records, however, please provide an estimate of anticipated costs in the event that there are fees for processing this Request.

EPA requests records on your system, e.g., its backend logs, and does not seek only those records which survive on an employee’s own machine or account. We do not demand your Office produce requested information in any particular form, instead **we request records in their native form, with specific reference to the U.S. Securities and Exchange Commission Data Delivery Standards²**. The covered information we seek is electronic information, this includes electronic *records*, and other public *information*.

To quote the SEC Data Delivery Standards, “Electronic files must be produced in their native format, i.e. the format in which they are ordinarily used and maintained during the normal course of business. For example, an MS Excel file must be produced as an MS Excel file rather than an image of a spreadsheet. ***(Note: An Adobe PDF file is not considered a native file unless the document was initially created as a PDF.)***” (emphases in original).

In many native-format productions, certain public information remains contained in the record (e.g., metadata). Under the same standards, to ensure production of all information

² <https://www.sec.gov/divisions/enforce/datadeliverystandards.pdf>

requested, if your production will be de-duplicated it is vital that you 1) preserve any unique metadata associated with the duplicate files, for example, custodian name, and, 2) make that unique metadata part of your production.

Native file productions may be produced without load files. However, native file productions must maintain the integrity of the original meta data, and must be produced as they are maintained in the normal course of business and organized by custodian-named file folders. A separate folder should be provided for each custodian.

In the event that necessity requires your Office to produce a PDF file, due to your normal program for redacting certain information and such that native files cannot be produced as they are maintained in the normal course of business, in order to provide all requested information each PDF file should be produced in separate folders named by the custodian, *and* accompanied by a load file to ensure the requested information appropriate for that discrete record is associated with that record. The required fields and format of the data to be provided within the load file can be found in Addendum A of the above-cited SEC Data Standards. All produced PDFs must be text searchable.

We look forward to your timely response. If you have any questions, or would like to discuss this matter further, do not hesitate to contact me by email. I look forward to your timely response.

Sincerely,

A handwritten signature in black ink that reads "Matthew D. Hardin". The signature is written in a cursive style with a large, stylized initial "M".

Matthew D. Hardin
Executive Director
Energy Policy Advocates
Matthewdhardin@gmail.com