

FILES & RECORDS MANAGEMENT

I. PURPOSE

The Agency will retain records in an orderly fashion for time periods that comply with legal and governmental requirements and as needed for general business requirements; to outline the methods for filing, retaining, and disposing of business records necessary to support our work (including opinions, resolution of differences, conclusions and research utilized in analysis), our correspondence with customers/clients, our work product and items of continuing significance.

II. SCOPE

This procedure applies to all business documentation generated by the Agency. However, this does not necessarily cover internal or certain day-to-day business correspondence.

Drafts or other documents not utilized should not be retained. Documents and records transmitted as attachments via email should be considered separately from the email messages to which they are attached.

III. POLICY

A. DIGITAL FILES

- Electronic documents and emails shall be maintained on a secure server or secure web site.
- Agency files or information should not be stored on personal electronic devices to the extent possible.
- Employee hard drives shall be password protected.
- Customer correspondence created/maintained for documentation purposes should be stored upon the Customer Records Management (CRM) system whenever possible.
- Collection letters, invoices and other customer correspondence will

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be maintained in CRM when feasible or within pertinent folders where appropriate (i.e., collection letters with collections files).

- Confidential and Sensitive files should be watermarked or include a header noting the words "CONFIDENTIAL" or "SENSITIVE" or "Subject to NDA", or similar notation, whenever possible.

B. PAPER FILES

- Whenever possible, the Agency should maintain records electronically.
- Confidential and sensitive paper records or correspondence should be maintained in file cabinets with locking capability when not in use.
- Certain documents, whenever possible, as a practical matter, shall be stamped, watermarked or headed "CONFIDENTIAL", "SENSITIVE", or "Subject to NDA", or similar notation.
- Files labeled with employee names shall be considered confidential personnel files, and shall be accessed only by those who are in the direct line of supervisory authority, or those who are responsible for payroll or other human resource duties, and shall be accessed on a need-to-know basis.
- Files labeled with an energy counterparty name shall be considered confidential.

C. FILING SYSTEM

- To ensure efficient access, filing centers will be established. To reduce the amount of duplicate and unnecessary record retention, individual desk files should be avoided unless they are used in daily operations. All other departmental or agency records should be filed in the departmental central filing areas.
- Unless necessary, records should only be kept by the originator or sender and not by the receiver to avoid duplicate filing systems.

D. RECORD RETENTION AND LONG-TERM STORAGE

- Non-permanent physical files will be stored in cardboard file boxes. Each file box will be labeled on the front with the contents, dates covered, and destruction date if applicable. Permanent physical records will be maintained in metal fire-resistant file cabinets.
- Files should be stored only in boxes with similar items, dates and retention periods. This will allow easier access and purging of records. A general rule to keep in mind is that it is better to only half-fill a file box than to file dissimilar types of files in the same box.
- An employee designated by the Chief Executive Officer will be responsible for categorizing and maintaining a listing of records maintained and the location.
- An employee designated by the Chief Executive Officer will be responsible for coordinating the creation, and maintenance of record retention periods, and will maintain and issue the "Records Retention Periods" as appropriate.
- Maintain all files for as long as is necessary but only to the extent they serve a useful purpose or satisfy business or legal requirements. "Records Retention Periods" provides a guide.
- The Chief Executive Officer may make further updates to the Retention Periods, to this Files and Records Management policy, and to any Retention and Destruction Policy.

E. RECORD DESTRUCTION

- An employee designated by the Chief Executive Officer will circulate a listing of file categories to be destroyed to all employees thirty days prior to destruction, for review and comment.
- Three to six months after each year-end, an employee designated by the Chief Executive Officer will proceed with destruction of all files that have exceeded their recognized holding period.
- Destruction of physical files will be performed by an

independent, outside service for shredding and disposal. Any paper with a social security number, a federal ID number, confidential information or sensitive data, or a client name on it must be destroyed in this manner.

F. DISPOSAL OF RECORDS INTO THE AGENCY'S GENERAL TRASH SERVICE IS NOT ALLOWED

- Electronic documents are destroyed by deleting them from the medium on which they are stored, and then purging the medium itself.
- Email messages not saved for filing in the correspondence file or other appropriate folder should be deleted.

IV. ATTACHMENTS

1. Records Retention Periods

RECORDS RETENTION PERIODS

Record Series Title	Retention Period	Description/Comments
Accounts payable/receivable	5 years	Ledgers, paid bills, purchase orders, bank statements, checks, and deposit slips, wires, expense reports/reimbursements, uncollectible accounts and write offs, depreciation schedules, 1099 Forms
Invoices	2 years	Vendor invoices for payment
Budget	Permanent	Forecasts & projections, Financial statements (end-of-year trial balances)
Audit	5 years	Financials, controller reports, IT audit reports
Customer Information and Data	5 years	Electronic information and reporting from Director of Customer Care, customer bill analyses, customer consent for third-party disclosures
Insurance records	30 years	Accident reports, claims, policies, workers comp
Loan documents	Permanent	Line/letter of credit documents, applications
Employee Records	10 - 30 years	Offer letter, benefits, evaluations, personnel change request
Recruitment	6 years from close	Employment application, resume, cover letters, job descriptions, interview evaluations
Payroll	7 years	Records and summaries, reports (federal, state, tax), W-2 forms, W-4 forms, garnishments, 19's, retirement plan
Board and Committee Meeting Materials	Permanent	Final Board and Committee Meeting materials, and additional SVCE approved sub-committee materials
Board Approved Decisions	Permanent	Adopted Resolutions, final meeting minutes
Contracts	Expiration +7 years	Leases, agreements, amendments, power supply contracts, etc.
Correspondence (general)	3 years	Email & written correspondence not containing materials related to invoices, budgets, audits, insurance records, loans, personnel recruitment and employee records, board and committee materials, or contracts, marketing or solicitation materials.
Marketing Collateral	7 years	Publications, promotional brochures, flyers, newsletters & alerts
Solicitations	7 years	Request for proposals, bids, quotes, etc.
Non-Disclosure Agreements	7 years	Agreements with advisors, board members or vendors