



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
(503) 464-8926 • facsimile (503) 464-2200

Douglas C. Tingey
Assistant General Counsel

March 10, 2006

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 2148
Salem OR 97308-2148

Re: In the Matter of the Revised Tariff Schedules for Electric Service filed in Oregon by
PORTLAND GENERAL ELECTRIC COMPANY
OPUC Docket No. UE _____

Attention Filing Center:

Enclosed for filing is Portland General Electric's Motion for Approval of Protective Order. This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

/s/ DOUGLAS C. TINGEY

DCT:am

cc: UE 115 Service List

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE _____

In the Matter of the Revised Tariff Schedules
for Electric Service in Oregon filed by
PORTLAND GENERAL ELECTRIC
COMPANY

**MOTION FOR APPROVAL OF
PROTECTIVE ORDER**

Pursuant to ORCP 36(C)(7) and OAR 860-12-0035(1)(k), Portland General Electric Company (“PGE”) requests the issuance of a Protective Order in this proceeding. PGE believes good cause exists for the issuance of such an order to protect confidential market information and confidential business information, plans and strategies. In support of this Motion, PGE states:

1. Concurrent with the filing of this Motion, PGE is filing a letter requesting that this docket be opened for a general rate case PGE intends to file on or before Wednesday, March 15, 2006.

2. A portion of the workpapers supporting the rate case filing will contain confidential information regarding PGE’s natural gas, electric and coal market activities as well as other confidential business matters. This information will include proprietary modeling code, PGE’s timing of and expected prices for electricity purchases, PGE’s timing of and expected prices for natural gas purchases, PGE’s forward position for electricity, PGE’s forward position for natural gas, and whether and the amount by which PGE is long or short for electricity and natural gas during various periods in 2006 and 2007. This information is confidential commercial information and/or trade secrets under ORCP 36(C)(7).

3. In the interest of putting all of the relevant information before the Commission, PGE would like to file a complete set of workpapers with its rate case testimony filing.

4. PGE also anticipates that parties participating in this docket will make further requests for confidential information. PGE further anticipates it will be required to file periodic updates containing confidential information in this proceeding.

5. While PGE desires to provide parties with requested information, the information is of significant commercial value, and its public disclosure could be detrimental to PGE and its customers. The information discloses PGE's position, strategy and future needs to purchase and sell electricity, natural gas and coal. If other parties involved in the wholesale electricity, natural gas and coal markets obtained this information, they could use it to the financial harm of PGE and its customers.

6. The Commission should therefore issue a Protective Order to protect the confidentiality of that material. The requested order, identical to the one that the Commission customarily issues, is attached.

For the reasons stated above, PGE requests that a protective order be issued in this proceeding.

DATED this 10th day of March, 2006.

Respectfully submitted,

/s/ DOUGLAS C. TINGEY

Douglas C. Tingey, OSB No. 04436
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Portland General Electric Company
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CERTIFICATE OF SERVICE

I certify that I have caused to be served the foregoing **MOTION FOR APPROVAL OF PROTECTIVE ORDER OF PORTLAND GENERAL ELECTRIC** by First Class US Mail, postage prepaid and properly addressed, upon the parties from the attached service list for OPUC Docket UE 115.

Dated this 10th day of March, 2006.

/s/ DOUGLAS C. TINGEY_____

Douglas C. Tingey

UE 115 Service List

<p>L HELLER EHRMAN WHITE & MCAULIFFE LLP 200 SW MARKET ST STE 1750 PORTLAND OR 97201-5718</p>	<p>PORTLAND BOMA 1020 SW TAYLOR ST STE 760 PORTLAND OR 97205-2512</p>
<p>SUSAN ANDERSON PORTLAND CITY OF - OFFICE OF SUSTAINABLE DEV 721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447</p>	<p>LINCOLN WOLVERTON EAST FORK ECONOMICS PO BOX 620 LA CENTER WA 98629</p>
<p>JULIE BRANDIS ASSOCIATED OREGON INDUSTRIES 1149 COURT ST NE SALEM OR 97301-4030</p>	<p>PHIL CARVER OREGON DEPARTMENT OF ENERGY 625 MARION ST NE STE 1 SALEM OR 97301-3742</p>
<p>MELINDA J DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR - STE 400 PORTLAND OR 97204</p>	<p>JIM DEASON 521 SW CLAY ST STE 107 PORTLAND OR 97201-5407</p>
<p>MICHAEL C DOTTEN HELLER EHRMAN WHITE & MCAULIFFE LLP 200 SW MARKET ST - STE 1750 PORTLAND OR 97201-5718</p>	<p>ANDREA FOGUE LEAGUE OF OREGON CITIES PO BOX 928 1201 COURT ST NE STE 200 SALEM OR 97308</p>
<p>MICHAEL EARLY INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES 333 SW TAYLOR STE 400 PORTLAND OR 97204</p>	<p>JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205</p>
<p>EDWARD A FINKLEA CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW 5TH - STE 2000 PORTLAND OR 97204</p>	<p>ANN L FISHER AF LEGAL & CONSULTING SERVICES 2005 SW 71ST AVE PORTLAND OR 97225-3705</p>
<p>DAVID E HAMILTON NORRIS & STEVENS 621 SW MORRISON ST STE 800 PORTLAND OR 97205-3825</p>	<p>DAVID HATTON DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096</p>
<p>BRUCE HELLEBUYCK PACIFICORP 825 NE MULTNOMAH STE 800 PORTLAND OR 97232</p>	<p>ONITA KING NORTHWEST NATURAL 220 NW 2ND AVE PORTLAND OR 97209-3991</p>

MICHAEL L KURTZ BOEHM, KURTZ & LOWRY 36 E 7TH ST STE 1510 CINCINNATI OH 45202-4454	STEVEN G LINS GLENDALE CITY OF 613 E BROADWAY STE 220 GLENDALE CA 91206-4394
S BRADLEY VAN CLEVE DAVISON VAN CLEVE PC 333 SW TAYLOR - STE 400 PORTLAND OR 97204	KATHERINE A MCDOWELL STOEL RIVES LLP 900 SW FIFTH AVE STE 1600 PORTLAND OR 97204-1268
JAN W MICHAEL APPLIED ECONOMICS GROUP 566 CENTER RD HILLSBORO NH 03244	MICHAEL M MORGAN TONKON TORP LLP 888 SW 5TH AVE STE 1600 PORTLAND OR 97204-2099
PAUL M MURPHY MURPHY & BUCHAL LLP 2000 SW FIRST AVE STE 320 PORTLAND OR 97201-5342	WARREN PARRISH 30450 NE WILSONVILLE RD NEWBERG OR 97132
NORMAN A PEDERSEN JONES DAY REAVIS & POGUE 555 W FIFTH ST STE 4600 LOS ANGELES CA 90013-1025	WALTER PERRY DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97310-0560
LON L PETERS NORTHWEST ECONOMIC RESEARCH INC 624 SE ANDOVER PL PORTLAND OR 97202-9006	DAVID ROBERTSON NATIONAL ENERGY AND GAS TRANSMISSION INC 1400 SW 5TH AVE - STE 900 PORTLAND OR 97201
DONALD W SCHOENBECK REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455	RACHEL SHIMSHAK RENEWABLE NORTHWEST PROJECT 917 SW OAK ST STE 303 PORTLAND OR 97205-2806
JOHN SIEKAS OREGON STEEL MILLS INC PO BOX 2760 PORTLAND OR 97208	JACK SNYDER ATOFINA CHEMICALS INC 6400 NW FRONT AVENUE PORTLAND OR 97210
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BENJAMIN WALTERS
PORTLAND CITY OF - OFFICE OF CITY
ATTORNEY
1221 SW 4TH AVE - RM 430
PORTLAND OR 97204

STEVEN WEISS
NORTHWEST ENERGY COALITION
4422 OREGON TRAIL CT NE
SALEM OR 97305

ORDER NO.

ENTERED

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

In the Matter of the Revised Tariff Schedules
for Electric Service in Oregon filed by
PORTLAND GENERAL ELECTRIC
COMPANY

ORDER

DISPOSITION: MOTION FOR PROTECTIVE ORDER GRANTED

On March 10, 2006, Portland General Electric Company (“PGE”) filed a Motion for a Protective Order with the Public Utility Commission of Oregon (“Commission”). PGE states that good cause exists for the issuance of such an order to protect confidential business information, plans and strategies. Specifically, PGE states that the workpapers to be filed with its general rate case testimony in this docket will include confidential information such as its proprietary modeling code, timing of and expected prices for electricity and natural gas purchases, and its forward position for electricity and natural gas, along with other confidential information. PGE adds that the public release of such information could prejudice PGE and its customers.

Pursuant to OAR 860-012-0035(1)(k), I find that good cause exists to issue a Protective Order, attached as Appendix A. Under the terms of the order, a party may designate as confidential any information that falls within the scope of ORCP 36(C)(7).

Confidential information shall be disclosed only to a “qualified person” as defined in paragraph 3 of the Protective Order. Authors of the confidential material, the Commission or its Staff, and counsel of record for a party or persons directly employed by counsel are "qualified persons" who may review confidential information. Other persons desiring confidential information must become qualified pursuant to paragraph 10.

To receive confidential information, however, all parties—with the general exception of Staff—must sign the Consent to be Bound Form attached as Appendix B. This includes the party seeking the issuance of the protective order, because any party may designate information as confidential under this order.

The confidentiality of confidential information shall be preserved for a period of five years from the date of the final order in this docket, unless extended by the Commission at the request of the party desiring confidentiality.

ORDER NO.

All persons who are given access to confidential information have the duty to monitor their own conduct to ensure their compliance with the Protective Order. Such persons shall not use or disclose the information for any purpose other than the preparation for and conduct of this proceeding, and shall take all reasonable precautions to keep the confidential information secure. If any questions exist as to the status of any person to receive confidential information, the parties may contact the Administrative Hearings Division at (503) 378-6678.

ORDER

IT IS ORDERED that the Protective Order, attached as Appendix A, shall govern the disclosure of confidential information in this case.

Made, entered, and effective on _____.

[Judge]
Administrative Law Judge

A party may appeal this order to the Commission pursuant to OAR 860-014-0091.

PROTECTIVE ORDER

DOCKET NO. UE ____

Scope of this Order-

1. This order governs the acquisition and use of “Confidential Information” in this proceeding.

Definitions-

2. “Confidential Information” is information that falls within the scope of ORCP 36(C)(7) (“a trade secret or other confidential research, development, or commercial information”).

3. A “qualified person” is an individual who is:

- a. An author(s), addressee(s), or originator(s) of the Confidential Information;
- b. A Commissioner or Commission staff;
- c. Counsel of record for a party;
- d. A person employed directly by counsel of record; or
- e. A person qualified pursuant to paragraph 10. This includes parties and their employees.

Designation of Confidential Information-

4. A party providing Confidential Information shall inform other parties that the material has been designated confidential by placing the following legend on the information:

CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER

To the extent practicable, the party shall designate as confidential only those portions of the document that fall within ORCP 36(C)(7).

5. A party may designate as confidential any information previously provided by giving written notice to the other parties. Parties in possession of newly designated Confidential

Information shall, when feasible, ensure that all copies of the information bear the above legend to the extent requested by the party desiring confidentiality.

Information Given to the Commission-

6. Confidential Information that is: (a) filed with the Commission or its staff; (b) made an exhibit; (c) incorporated into a transcript; or (d) incorporated into a pleading, brief, or other document, shall be printed on yellow paper, separately bound and placed in a sealed envelope or other appropriate container. An original and five copies each separately sealed shall be provided to the Commission. **Only the portions of a document that fall within ORCP 36(C)(7) shall be placed in the envelope/container.** The envelope/container shall bear the legend:

THIS ENVELOPE IS SEALED PURSUANT TO ORDER
NO. _____ AND CONTAINS CONFIDENTIAL
INFORMATION. THE INFORMATION MAY BE SHOWN
ONLY TO QUALIFIED PERSONS AS DEFINED IN THE
ORDER.

7. The Commission's Administrative Hearings Division shall store the Confidential Information in a locked cabinet dedicated to the storage of Confidential Information.

Disclosure of Confidential Information-

8. Parties desiring receipt of Confidential Information shall sign the Consent to be Bound Form attached as Appendix B. This requirement does not apply to the Commission staff. Confidential Information shall not be disclosed to any person other than a "qualified person," as defined in paragraph 3. When feasible, Confidential Information shall be delivered to counsel. In the alternative, Confidential Information may be made available for inspection and review by qualified persons in a place and time agreeable to the parties or as directed by the Administrative Law Judge.

9. Qualified persons may disclose confidential information to any other qualified person, unless the party desiring confidentiality protests as provided in Section 11.

10. To become a qualified person under paragraph 3(e), a person must:

- a. Read a copy of this Protective Order;
- b. Execute a statement acknowledging that the order has been read and agreeing to be bound by the terms of the order;
- c. Date the statement;

- d. Provide a name, address, employer, and job title; and
- e. If the person is a consultant or advisor for a party, provide a description of the nature of the person's consulting or advising practice, including the identity of his/her current, past, and expected clients.

Counsel shall deliver a copy of the signed statement including the information in (d) and (e) above to the party desiring confidentiality and to all parties of record. Such notification may be made via e-mail or facsimile. A person qualified under paragraph 3(e) shall not have access to Confidential Information sooner than five (5) business days after receipt of a copy of the signed statement including the information in (d) and (e) above by the party desiring confidentiality.

11. All qualified persons shall have access to Confidential Information, unless the party desiring confidentiality protests as provided in this paragraph. The party desiring to restrict the qualified person(s) from accessing specific Confidential Information must provide written notice to the qualified person(s) and counsel for the party associated with the qualified person(s) as soon as the party becomes aware of reasons to restrict access. The parties must promptly confer and attempt to resolve any dispute over access to Confidential Information on an informal basis before filing a motion with the Administrative Law Judge. If the dispute cannot be resolved informally, either party may file a motion with the Administrative Law Judge for resolution. Either party may also file a motion if the other party does not respond within five days to a request to resolve the dispute. A motion must describe in detail the intermediate measures, including selected redaction, explored by the parties and explain why such measures do not resolve the dispute. After receipt of the written notice as required in this paragraph, the specific Confidential Information shall not be disclosed to the qualified person(s) until the issue is resolved.

Preservation of Confidentiality-

12. All persons who are given access to any Confidential Information by reason of this order shall not use or disclose the Confidential Information for any purpose other than the purposes of preparation for and conduct of this proceeding, and shall take all reasonable precautions to keep the Confidential Information secure. Disclosure of Confidential Information for purposes of business competition is strictly prohibited.

Qualified persons may copy, microfilm, microfiche, or otherwise reproduce Confidential Information to the extent necessary for the preparation and conduct of this proceeding. Qualified persons may disclose Confidential Information only to other qualified persons associated with the same party.

Duration of Protection-

13. The Commission shall preserve the confidentiality of Confidential Information for a period of five years from the date of the final order in this docket, unless extended by the Commission at the request of the party desiring confidentiality. The Commission shall notify the party desiring confidentiality at least two weeks prior to the release of confidential information.

Destruction After Proceeding-

14. Counsel of record may retain memoranda, pleadings, testimony, discovery, or other documents containing Confidential Information to the extent reasonably necessary to maintain a file of this proceeding or to comply with requirements imposed by another governmental agency or court order. The information retained may not be disclosed to any person. Any other person retaining Confidential Information or documents containing such Confidential Information must destroy or return it to the party desiring confidentiality within 90 days after final resolution of this proceeding unless the party desiring confidentiality consents, in writing, to retention of the Confidential Information or documents containing such Confidential Information. This paragraph does not apply to the Commission or its Staff.

Appeal to the Presiding Officer-

15. If a party disagrees with the designation of information as confidential, the party shall contact the designating party and attempt to resolve the dispute on an informal basis. If the parties are unable to resolve the dispute, the party desiring to use the information may move for exclusion of the information from the protection conferred by this order. The motion shall:

- a. Specifically identify the contested information, and
- b. Assert that the information does not fall within ORCP 36(C)(7) and state the reasons therefore.

The party resisting disclosure has the burden of showing that the challenged information falls within ORCP 36(C)(7). If the party resisting disclosure does not respond to the motion within ten (10) calendar days, the challenged information shall be removed from the protection of this order.

The information shall not be disclosed pending a ruling by the Administrative Law Judge on the motion.

Additional Protection-

16. The party desiring additional protection may move for any of the remedies set forth in ORCP 36(C). The motion shall state:

ORDER NO.

- a. The parties and persons involved;
- b. The exact nature of the information involved;
- c. The exact nature of the relief requested;
- d. The specific reasons the requested relief is necessary; and
- e. A detailed description of the intermediate measures, including selected redaction, explored by the parties and why such measures do not resolve the dispute.

The information need not be released and, if released, shall not be disclosed pending the Commission's ruling on the motion.

ORDER NO.

SIGNATORY PAGE

DOCKET NO. _____

I. Consent to be Bound-

This Protective Order governs the use of “Confidential Information” in this proceeding.

_____PGE agrees to be bound by its terms of this Protective Order.

By: _____
Signature & Printed Date

II. Persons Qualified pursuant to Paragraphs 3(a) through 3 (d)

_____PGE identifies the following person(s) automatically qualified under paragraph 3(a) through (d).

_____ Printed	_____ Date
_____ Printed	_____ Date
_____ Printed	_____ Date
_____ Printed	_____ Date
_____ Printed	_____ Date
_____ Printed	_____ Date

III. Persons Qualified pursuant to Paragraph 3(e) and Paragraph 10.

I have read the Protective Order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 10.

By: _____
Signature & Printed

_____ Date

By: _____
Signature & Printed

_____ Date

By: _____
Signature & Printed

_____ Date

By: _____
Signature & Printed

_____ Date



Portland General Electric Company
Legal Department
121 SW Salmon Street • Portland, Oregon 97204
(503) 464-8926 • facsimile (503) 464-2200

Douglas C. Tingey
Assistant General Counsel

March 10, 2006

Michael Grant
Chief Administrative Law Judge
Oregon Public Utility Commission
PO Box 2148
Salem OR 97308-2148

Re: In the Matter of the Revised Tariff Schedules for Electric Service filed in Oregon by
PORTLAND GENERAL ELECTRIC COMPANY
OPUC Docket No. UE _____

Dear Judge Grant:

Portland General Electric is preparing to file a general rate case with the Commission by Wednesday, March 15, 2006. A portion of the workpapers that will accompany this filing will contain confidential information the disclosure of which could harm PGE and its customers.

In order to file a complete set of workpapers with PGE's testimony, we request that a docket be opened for this proceeding, and that a Protective Order be issued in that docket. We are filing a Motion for Protective Order with the Commission today.

Thank you for your consideration of this matter. If you have any questions or need additional information, please do not hesitate to call.

Sincerely,

/s/ DOUGLAS C. TINGEY

DCT:am

cc: UE 115 Service List