



Portland General Electric Company
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Barbara W. Halle
Assistant General Counsel

February 9, 2007

Via Electronic Filing and U.S. Mail

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

Re: AR 511

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and one copy of:

- **COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY.**

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,

A handwritten signature in black ink, appearing to read "Barbara W. Halle", written in a cursive style.

Barbara W. Halle

BWH:jbf
Enclosures

cc: Service List – AR 511

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 511

In the Matter of)	
)	
Rulemaking to Adopt and Amend)	COMMENTS OF PORTLAND
Division 011 Rules.)	GENERAL ELECTRIC COMPANY

INTRODUCTION

Portland General Electric (“PGE”) appreciates the opportunity to file comments in this rulemaking.

OAR 860-011-0080

(3) PGE suggests that we add after the second sentence the following sentence: "For these purposes, authorization by E-mail will be considered written authorization."

OAR 860-011-0080

(4) After the comma in the first sentence, PGE suggests inserting the words "prior to any release of such information," to make it clear that the Commission intends to honor the designation of confidentiality for the information while the process described in the rest of the rule is followed through.

OAR 860-011-0080

(5) PGE suggests that we eliminate the words "consider the information public" from the second sentence. The issue is not whether the information itself is public, but whether the record that is being requested can properly be released by the Commission. PGE suggests that the language in the rule should stick to addressing the actions that will be taken under the circumstances.

OAR 860-011-0100

(1) PGE believes it would be better to make it clear to whom the submission must be made in order to trigger the application of the rule. Therefore, we suggest adding the words "to the Commission or Commission Staff" after the word "submitted" in the first sentence of this subsection.

OAR 860-011-0100

(3) The words "included in a filing" in the first sentence are too restrictive, because, as we discussed in the workshop, sometimes the requested information does not relate to a "filing" per se. PGE suggests that we replace the words "included in a filing" with "submitted pursuant to this rule" in the first sentence of this subsection.

CONCLUSION

We appreciate the opportunity to provide these comments in addition to our oral comments regarding process of burden of proof that we understand will be incorporated into the next draft of the rules.

DATED this 9TH day of February 2007.

Respectfully Submitted,

/s/ BARBARA W. HALLE

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the **COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service.

Dated at Portland, Oregon, this 9TH day of February 2007.

/s/ BARBARA W. HALLE

BARBARA W. HALLE

AR 511 SERVICE LIST

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