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November 21, 2014

Via E-Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem OR 97302

Re: Rulemaking to Streamline eFiling and Other Housekeeping Changes
Docket No. AR 583

Dear Filing Center:

The Industrial Customers of Northwest Utilities (“ICNU”) submits these comments on the Oregon Public Utility Commission’s (“Commission”) proposed rulemaking to streamline the e-filing process.

In general, ICNU supports e-filing and the rulemaking changes the Commission has proposed. ICNU echoes, however, the comments of the other parties in this docket opposing the Commission’s proposal to require delivery of confidential documents on the filing due date. The current rule (OAR 860-001-0170(1)(f)-(g)) allows parties to file a redacted version of the filing on the due date and mail, via first class mail, the confidential documents on the same date. The proposed revisions would require parties to deliver to the Commission the confidential documents on the same date that they electronically file the redacted version. ICNU does not have the resources to personally deliver confidential documents to the Commission on the date they are filed. Accordingly, the proposed revisions would effectively require ICNU to complete its filings at least two days before the due date so that it could mail them to the Commission to ensure that they are timely received. As other parties have mentioned, the realities of filing preparation – particularly when confidential material is involved – often require preparation and finalization up to, and including, the due date. ICNU supports maintaining the current rule’s language allowing for mailing of confidential material to the Commission on the filing date.

Additionally, ICNU does not support Portland General Electric’s (“PGE”) proposal to remove the requirement that paper copies of filings exceeding 100 pages be physically served on parties. PGE’s most recent rate case filing was over 800 pages in length. The utility’s resources and capabilities much better position it to serve physical copies of such filings on parties rather than requiring parties like ICNU to print these filings themselves.

ICNU Comments – Docket AR 583

November 21, 2014

Page 2

ICNU appreciates the opportunity to comment on the Commission's proposed rulemaking and extends its gratitude to the Commission Staff for its work in streamlining the e-filing process.

Respectfully submitted,

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