

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1728**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Application to Update Schedule 201  
Qualifying Facility Information.

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PORTLAND GENERAL ELECTRIC  
COMPANY'S REPLY TO NEWSUN  
ENERGY'S RESPONSE TO MOTION  
FOR MODIFIED PROTECTIVE ORDER

Portland General Electric Company (PGE) files this reply in accordance with OAR 860-001-0080(3)(d). PGE respectfully requests that the ALJ grant PGE's motion for a modified protective order (MPO) with the additional clarifications described in this reply.

PGE notes that it conferred with parties before filing its motion for a modified protective order. Specifically, PGE provided its draft motion and proposed order on April 4, 2024. PGE then filed its motion on April 8, 2024. NewSun provided its feedback via email only after PGE filed its motion and shortly before it filed its response.

PGE continues to have concerns with modifying these timeframes in a way that could impact the overall docket schedules. However, while PGE is concerned about deviating from timeframes that have been consistently approved by the Commission in various modified protective orders, because this modified protective order is targeted at specific responses to Staff information requests, PGE does not oppose NewSun's proposed modifications in this case.

PGE respectfully requests that the ALJ approve PGE's proposed modified protective order and does not oppose NewSun's proposed change.

DATE this 12<sup>th</sup> day of April 2024.

Respectfully Submitted By:



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