BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

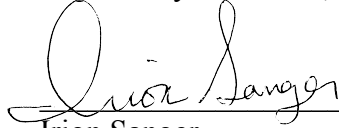**UM 1845**

In the Matter of	)	
	)	NORTHWEST AND
PACIFICORP, dba PACIFIC POWER,	)	INTERMOUNTAIN POWER
	)	PRODUCERS COALITION'S
PacifiCorp's Application for Approval of	)	SURRESPONSE IN OPPOSITION TO
2017 Request for Proposals.	)	MOTION FOR MODIFIED
	)	PROTECTIVE ORDER
	)	

The Northwest and Intermountain Power Producers Coalition ("NIPPC") files this surresponse to PacifiCorp's reply in support of its motion for modified protective order ("PacifiCorp Reply"). PacifiCorp changed its requested Modified Protective Order so that it no longer applies to anyone who might negotiate a power purchase agreement, including with the Company. However, PacifiCorp is still requesting that "Persons that are not involved in PacifiCorp's ongoing solicitation processes as bidders, including persons who represent or advise bidders" still not be allowed to review any highly confidential material if they represent bidders on entirely unrelated matters. As PacifiCorp's position has changed and to remove any potential confusion, NIPPC files this surresponse to inform the Oregon Public Utility Commission (the "Commission") regarding NIPPC's position.
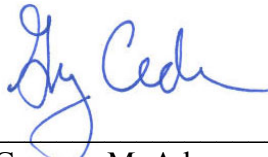
NIPPC's attorneys will not execute PacifiCorp's newly proposed modified protective order. The Commission has a simple choice in which it can either: 1) Adopt PacifiCorp's modified protective order that was never discussed with the parties and will contain unprecedented restrictions; or 2) Allow NIPPC to review the highly confidential material and participate in all phases of this competitive bidding proceeding.

Dated this 1st day of March 2018.

Respectfully submitted,

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