



November 21, 2014

Via Electronic Filing and FedEx

Public Utility Commission
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem, OR 97308

Re: Docket No. AR 583: Comments of Sierra Club

Please find enclosed the original and three (3) copies of the Comments of Sierra Club in the above-referenced docket. This document has been e-filed with the Commission and served on parties via email.

Please let me know if you have any questions. Thank you.

Respectfully submitted,

/s/ Derek Nelson

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cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 583

In the Matter of

Rulemaking to Streamline eFiling and Other
Housekeeping Changes

SIERRA CLUB'S COMMENTS

The Sierra Club respectfully submits the following comments in the above-captioned matter. Overall, the Sierra Club supports the Commission's changes to OAR Chapter 860 Divisions 001-082 because they nearly eliminate the need to file and serve paper documents. However, in the case of filings that still require a physical format, the proposed changes would reduce the time available for intervenors to respond in contested cases and declaratory ruling proceedings. Like CUB, Sierra Club opposes the changes that cover the due dates for filing and service of confidential paper copies, given the potential loss of several days of preparation time in cases where confidential material is a component of the filing.

Under the current rules, for intervenors submitting materials on CD, DVD or submitting confidential pages, the package containing those materials need only be post-marked on the filing due date.¹ Under the proposed changes, intervenors would be required to ensure that those same materials would arrive on the due date.² Sierra Club agrees with CUB that the Commission should not adopt this revision because it would disproportionately burden intervenors but does not evidence a strong, countervailing benefit to the Commission or utilities. Like CUB, Sierra Club frequently finds itself finalizing voluminous submissions on filing day. For this reason, the filing arrangement should remain the same for the transmittal of confidential

¹ Given that Sierra Club is out of state, we try to utilize an overnight delivery service in order to avoid unnecessary delay to the Commission and other parties.

² OAR 860-001-0170(1)(a),(f) and (g).

material, which gives parties filing confidential material the same response time as those parties not submitting protected information. In the alternative, the Commission could explore allowing for the e-filing of confidential information, or simply extend the filing deadlines by 3 days to accommodate intervenors like CUB.

Finally, Sierra Club is curious why the Commission would strike the request that documents be printed on both sides of the page on recycled paper when possible.³ While this may seem trivial given the move to e-filing, it remains an admirable policy that can translate into meaningful reductions in waste; accordingly, please keep it on the books.

Sierra Club appreciates the opportunity to comment on the Commission's efforts to streamline its processes, and make e-filing more accessible. Still, as described above, we respectfully request that you reconsider the extra burden two of the proposed changes could have on intervenors and the environment.

Dated: November 21, 2014

Respectfully submitted,

 /s/ Gloria D. Smith
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³ OAR 860-001-0140(3).

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of November, 2014, I caused to be served the foregoing COMMENTS OF SIERRA CLUB upon all party representatives on the official service list for this proceeding via electronic mail.

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Dated this 21st day of November, 2014 at San Francisco, CA.

/s/ Derek Nelson

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