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May 10, 2012

Public Utility Commission
Attn: Filing Center
550 Capitol Street NE #215
PO Box 2148
Salem, OR 97308

Re: **UM 1535--Confidential Comments of the Northwest and Intermountain Power Producers Coalition on Portland General Electric's Owner's Costs**

Dear Filing Center:

Enclosed please find the Confidential Comments of the Northwest and Intermountain Power Producers Coalition ("NIPPC") for filing in the above-reference docket. The Comments regard Portland General Electric's ("PGE") Owners Costs in its Request for Proposals, which PGE has designated as subject to the General Protective Order. Because the Comments contain extensive reference to and discussion of the information designated as protected, public disclosure of any portion of the Comments may compromise the protected nature of the protected information. Therefore, NIPPC is only providing these Comments as a confidential filing, and is not providing any redacted copies to the parties or the Commission.

I have enclosed an original and five copies of NIPPC's Confidential Comments, and am serving a copy on all parties to the proceeding who have signed the General Protective Agreement. The Independent Evaluator, Mr. Harry Judd of Accion Group, is on the service list but not listed as qualified to receive confidential information. Therefore, NIPPC has not served the Confidential Comments directly to Mr. Judd. However, NIPPC understands that Mr. Judd is bound by other confidentiality arrangements, and that PGE will provide Mr. Judd with an extra copy of the Confidential Comments that NIPPC will provide to PGE. NIPPC has no objection to PGE sharing the materials in this filing with Mr. Judd. If you have any questions, please contact me. Thank you for your assistance.

Sincerely,

Gregory M. Adams
Attorney for Northwest and
Intermountain Power Producers Coalition

Enc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of May, 2012, a true and correct copy of the within and foregoing **NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION'S COMMENTS ON PGE OWNERS' COST** was served as shown, with only those individuals qualified to receive confidential material (C) receiving the confidential paper copy of the filing:

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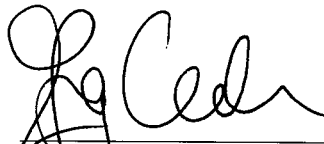
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By:



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