



ALISHA TILL
Direct (503) 290-3628
alisha@mrg-law.com

February 16, 2018

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1845 - In the Matter of PACIFICORP, dba PACIFIC POWER, Request for Proposals of an Independent Evaluator to Oversee the Request for Proposal Process.

Attached for filing in the above-referenced docket is PacifiCorp's Motion for Modified Protective Order.

Please contact this office with any questions.

Sincerely,

Alisha Till
Legal Assistant

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1845

In the Matter of
PACIFICORP, d/b/a PACIFIC POWER,

Application for Approval of 2017 Request for
Proposals.

PACIFICORP'S MOTION FOR
MODIFIED PROTECTIVE ORDER

I. INTRODUCTION

In accordance with OAR 860-001-0420 and OAR 860-001-0080(3), PacifiCorp d/b/a Pacific Power moves the Public Utility Commission of Oregon (Commission) for entry of a Modified Protective Order in this proceeding granting additional protections for highly confidential information, consisting of bid information, analysis and modeling that relies on bid information, and reports provided by independent evaluators that rely on and refer to bid information.

PacifiCorp's Request for Acknowledgement of Final Shortlist of Bidders in 2017R Request for Proposals (Request for Approval), filed concurrently with this motion, includes information submitted by bidders in the 2017R Request for Proposals (RFP) and the 2017S RFP. The 2017R RFP and 2017S RFP are ongoing. PacifiCorp is negotiating final agreements with the bidders selected to the final shortlist in the 2017R RFP and the company is evaluating bids to select the final shortlist in the 2017S RFP. Therefore, bid information and analysis and modeling based on that bid information, is highly sensitive, non-public commercial information. If disclosed, the highly confidential bid information would harm customers by compromising PacifiCorp's ability to successfully negotiate final agreements, and could result in less competitive bids in future RFPs.

To better prevent the inadvertent disclosure or improper use of highly commercially sensitive bid information, PacifiCorp requests that the Commission issue a Modified Protective Order that includes two narrowly tailored protections:

- First, PacifiCorp requests on-site review of the highly confidential information for all intervenors, except Staff and the Oregon Citizens' Utility Board (CUB). Preventing widespread distribution of the highly confidential information makes public disclosure, and the attendant harm, substantially less likely.
- Second, PacifiCorp requests that no access to highly confidential information be provided to persons involved in the company's ongoing solicitation processes as bidders, including persons who represent or advise bidders, or persons that reasonably expect to be involved in solicitations or negotiations of power purchase agreements within the next two years. Restricting access to these persons better ensures that bidders cannot, intentionally or not, improperly obtain an unfair competitive advantage by relying on another bidder's information.

Attachment A to this Motion is PacifiCorp's proposed Modified Protective Order.

II. BACKGROUND

On June 1, 2017, PacifiCorp filed an application for approval of its 2017R RFP. On June 15, 2017, PacifiCorp filed a Motion for a General Protective Order, which was granted on June 16, 2017.¹

Concurrent with the filing of this motion, PacifiCorp filed its Request for Approval, as required by competitive bidding guidelines (Guidelines) adopted by the Commission.² As required by Guideline 11, the company's Request for Approval includes the closing report prepared by Bates White, LLC, the independent evaluator (IE) appointed by the Commission. The IE's report includes details related to the bids that were submitted and analyzed as part

¹ Order No. 17-218.

² *In the Matter of the Pub. Util. Comm'n of Or., Investigation Regarding Competitive Bidding*, Docket No. UM 1182, Order No. 14-149 at 14 (Apr. 30, 2014) (adopting mandatory acknowledgement of final shortlists to "promote transparency in the utility procurement process").

of the 2017R RFP. A Modified Protective Order would provide additional protection for highly commercially sensitive, non-public bid information, and related analysis.

III. REQUEST FOR ADDITIONAL PROTECTION

OAR 860-001-0080(3)(a) contains five requirements for seeking a modified protective order. This motion addresses each of these requirements in the following subsections.

A. Exact Nature of the Information Involved (OAR 860-001-0080(3)(a)(A)).

PacifiCorp limited its highly confidential designation to only the 2017R RFP and 2017S RFP bid information and related analysis based on the bid information. This information constitutes highly sensitive commercial information that if disclosed would result in unfair competitive injury to the company, and, therefore, to customers.

B. Legal Basis for the Claim the Information is Protected under ORCP 36(C)(7) (OAR 860-001-0080(3)(a)(B)).

ORCP 36(C)(7) provides protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information.” Oregon’s Uniform Trade Secrets Act, ORS 646.461 to 646.475, defines a “trade secret” as information, including cost data, that: (a) derives independent economic value, actual or potential, from not being generally known to the public or to other person who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The Oregon public records law exempts from disclosure public records that are “trade secrets,” which “may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within an organization and which is used in a business it conducts, having actual

or potential commercial value, and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.”³

The information for which PacifiCorp seeks additional protection is non-public information that is highly proprietary and commercially sensitive. PacifiCorp has not finalized all the agreements for the 2017R RFP and is in the process of evaluating bids received in the 2017S RFP. The ongoing nature of both RFPs and continuing negotiations with counter-parties mandates the upmost confidentiality. PacifiCorp’s ability to negotiate least-cost, least-risk final agreements directly benefits the company’s retail customers. Accordingly, any disclosure of the bid information would have an immediate and deleterious effect on PacifiCorp’s ability to successfully negotiate the final agreements on behalf of customers. Disclosure of the price, terms, or conditions included in the 2017R RFP or 2017S RFP bids, or disclosure of PacifiCorp’s modeling and analysis of price, terms, and conditions, would provide current and potential future counter-parties a significant commercial advantage at the expense of the company and its customers.

Disclosure could also impact the competitiveness of future RFPs if bidders use highly confidential data from this case to inform their future bids. In addition, if bidders are not confident that their commercially sensitive bids will remain protected, they may choose to forego future RFPs. Thus, public disclosure of bid information will likely chill participation in future solicitations, make them less competitive, and reduce the likelihood that future RFPs result in the least-cost, least-risk resource for customers.

PacifiCorp has appropriately designated the bid information and associated analysis, as highly confidential information and requested reasonable protections to minimize the risk

³ ORS 192.345(2).

of disadvantaging the company in its negotiations in the 2017R RFP and its bid evaluations in the 2017S RFP, and to better ensure that future RFPs are competitive.

C. Exact Nature of the Relief Requested (OAR 860-001-0080(3)(a)(C)).

PacifiCorp's proposed relief is set forth in Attachment A and include two key protections. The company's recommended protections reasonably balance the interests of intervenors and customers by allowing appropriate access to highly confidential information, while also minimizing the risk of inadvertent disclosure or improper use, and the customer harm that would follow.

First, PacifiCorp recommends that review of the highly confidential information occur at the company's offices for all parties except Staff and CUB. On-site review will limit the risk that highly confidential information will be inadvertently disclosed because the information will remain in PacifiCorp's possession and control.

Second, PacifiCorp recommends that on-site review be restricted to only those persons that meet the following requirement:

The person requesting access to highly confidential information is not now involved and does not reasonably expect to be involved in the PacifiCorp's ongoing solicitation processes as a bidder, including a person who represent or advise bidders, or a person that reasonably expects to be involved in solicitations or negotiations of power purchase agreements within the next two years.

PacifiCorp's second proposed condition is intended to preclude access to highly confidential bid information by any person that performs work on behalf of bidders in either the 2017R or 2017S RFP, persons that may perform work on behalf of potential bidders in any future resource solicitation process occurring in the next two years, and persons that may perform work on behalf of any counter-party to current or future negotiated power purchase agreements. Restricting access protects against a person improperly using highly confidential

bid information to inform their participation in other solicitations, to the detriment of customers. This restriction is consistent with prior rulings⁴ and consistent with the Commission's competitive bidding guidelines, which contemplate that bidding information, including scoring and evaluation, will not be made available to other bidders.⁵

D. Specific Reasons the Relief Requested is Necessary (OAR 860-001-0080(3)(a)(D)).

Entry of a Modified Protective Order with additional protections will allow PacifiCorp to make the information available to the parties in a manner consistent with the fact that it is highly sensitive commercial information. Granting the requested additional protection also will significantly limit the risk of an inadvertent breach of confidentiality, which could adversely affect PacifiCorp, its bidders, and its customers.

The General Protective Order is insufficient because it does not provide adequate safeguards against the disclosure of highly confidential information. Reliance on the General Protective Order also would delay discovery and interfere with the expeditious handling of this case.

E. Description of the Intermediate Measures Explored by the Parties (OAR 860-001-0080(3)(a)(E)).

Additional protections, such as those contained in the proposed Modified Protective Order, are appropriate when the consequences of disclosure would be particularly severe. The Modified Protective Order also restricts the manner and means by which highly confidential information may be maintained, stored, and transmitted, thus minimizing the risk of inadvertent disclosure. Such protections and restrictions are prudent for the highly

⁴ See, e.g., *In the Matter of PacifiCorp d/b/a Pacific Power's 2017 Transition Adjustment Mechanism*, Docket No. UE 307, Ruling (Aug. 25, 2016) (precluding an expert witness's access to RFP results while final agreements were being negotiated because the expert represents competitors).

⁵ *In the Matter of the Pub. Util. Comm'n of Or., Investigation Regarding Competitive Bidding*, Docket No. UM 1182, Order No. 06-446 at 13-14 (Apr. 30, 2014).

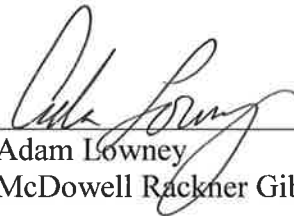
commercially sensitive, non-public information related to the rail transportation services contract at issue in this proceeding.

IV. CONCLUSION

For these reasons, PacifiCorp respectfully requests that the Commission issue a Modified Protective Order in the format provided as Attachment A to this Motion. PacifiCorp's proposed additional protections are reasonably designed and narrowly tailored to minimize the risk of customer harm resulting from the public disclosure of highly sensitive commercial information related to the 2017R and 2017S RFP bids.

Respectfully submitted this 16th day of February 2018.

By:


Adam Lowney
McDowell Rackner Gibson PC

Attorneys for PacifiCorp

ATTACHMENT A

PROPOSED MODIFIED PROTECTIVE ORDER

MODIFIED PROTECTIVE ORDER

UM 1845

Scope of this Order:

1. This order governs the acquisition and use of "Protected Information" and "Highly Protected Information" produced or used by any party to these proceedings.

Designation of Protected Information and "Highly Protected Information":

2. Any party may designate as Protected Information any information the party reasonably determines:
 - (a) Falls within the scope of ORCP 36(C)(7) (a trade secret or other confidential research, development, or commercial information); and
 - (b) Is not publicly available.
3. Any party may designate as Highly Protected Information any information that the party reasonably determines:
 - (a) Satisfies paragraph 2; and
 - (b) Is extremely commercially sensitive and requires additional restrictions on who may access the information than that provided under the Commission's general protective order.
4. To designate information as Protected Information or Highly Protected Information, a party must place the following legend on the material:

[PROTECTED/HIGHLY PROTECTED] INFORMATION
SUBJECT TO GENERAL PROTECTIVE ORDER NO. 18 - ____

The party should make reasonable efforts to designate as Protected Information or Highly Protected Information only the portions of the information covered by the above definitions.

5. Each page of a document containing Protected Information filed with the Commission and served on Qualified Persons under this order must be printed on yellow paper and placed in a sealed envelope or other appropriate container. Each page of a document containing Highly Protected Information filed with the Commission or provided to Qualified Persons under this order must be printed on green paper. Only the portions of a document that fall within the above definitions may be placed in the envelope/container. The envelope/container must bear the legend:

THIS ENVELOPE IS SEALED UNDER ORDER NO. 18- ____ AND CONTAINS
[PROTECTED/HIGHLY PROTECTED] INFORMATION. THE INFORMATION
MAY BE SHOWN ONLY TO PERSONS QUALIFIED TO ACCESS

[PROTECTED/HIGHLY PROTECTED] INFORMATION AS DEFINED IN THE ORDER.

6. Protected Information disclosed by a designating party to a Qualified Person through informal discovery or by means of the Commission's Huddle website will be marked "Protected Information" and uploaded to a file folder designated "protected" in Huddle, if applicable.
7. Highly Protected Information disclosed by a designating party to a person qualified to access Highly Protected information through informal discovery or by means of the Commission's Huddle website will be marked "Highly Protected Information" and uploaded to a file folder designated "highly protected" in Huddle, if applicable.
8. A party may designate as Protected Information or Highly Protected Information any information previously provided by giving written notice to the Commission and other parties. Parties in possession of newly designated Protected Information or Highly Protected Information must make reasonable efforts to ensure that all copies of the material containing the information bear the above legend if requested by the designating party.
9. A designating party must make reasonable efforts to ensure that information designated as Protected Information or Highly Protected Information continues to warrant protection under this order. If designated information becomes publically available or no longer falls within the scope of ORCP 36(C)(7), the designating party should make reasonable efforts to remove the protected designation and provide written notice to the Commission and other parties.

Challenge to Designation of Information as Protected or Highly Protected:

10. A party may informally challenge any designation of Protected Information or Highly Protected Information by notifying the designating party. Once notified, the designating party bears the burden of showing that the challenged information is covered by ORCP 36(C)(7). If a party challenges the "Highly Protected Information" designation, the designating party bears the burden of showing that the "Highly Protected Information" designation is necessary.
11. If the dispute cannot be resolved informally, the challenging party may file a written objection with the ALJ. The objection need only identify the information in dispute and certify that reasonable efforts to achieve informal resolution have failed.
12. Within five business days of service of the objection, the designating party must either remove the challenged protected designation or file a written response. A written response must identify the factual and legal basis of how the challenged information is protected under the Oregon Public Records Act, ORS 192.410 et seq, or the Uniform Trade Secrets Act, ORS 646.461(4). Broad allegations unsubstantiated by specific facts are not sufficient. If the designating party does not timely respond to the objection, the Commission will remove the protected designation from the challenged information.

13. The challenging party may file a written reply to any response within five business days of service of an objection. The designating party may file a sur-reply within three business days of service of a response. The ALJ will make all reasonable efforts to resolve the matter within 10 business days of service of the last filing.

Access to Protected Information and Highly Protected Information:

14. Only Qualified Persons may access Protected Information designated by another party under this Modified Protective Order. Persons automatically bound by this protective order and qualified to access Protected Information are:
 - (a) Commission employees; and
 - (b) Assistant Attorneys General assigned to represent the Commission.
15. Persons qualified upon a party signing the Consent to be Bound section of Appendix B are:
 - (a) Counsel for the party;
 - (b) Any person employed directly by counsel of record; and
 - (c) An employee of the Regulatory Division at the Oregon Citizens' Utility Board.

A party must identify all these persons in section 2 of Appendix B when consenting to be bound by the order, and must update this list throughout the proceeding to ensure it accurately identifies Qualified Persons.

16. A party bound by the modified protective order may seek to qualify other persons to access Protected Information by having those persons complete and sign Appendix C, and submitting that information to the Commission and all parties. Within five business days of receiving a copy of Appendix C, the designating party must either provide the requested access to Protected Information or file an objection under paragraph 22.
17. Only Qualified Persons, as defined in paragraph 14, are automatically bound by this Modified Protective Order and qualified to access Highly Protected Information.
18. Persons qualified to access Highly Protected Information upon signing the Signatory Page for Highly Protected Information, Appendix D, are:
 - (a) An employee or counsel of the Regulatory Division at the Oregon Citizens' Utility Board; and
 - (b) Persons that are not involved in PacifiCorp's ongoing solicitation processes as bidders, including persons who represent or advise bidders, or persons that reasonably expect to be involved in solicitations or negotiations of power purchase agreements within the next two years.
19. Access to Highly Protected Information will be provided to all persons qualified under paragraph 18(b) only at PacifiCorp's offices. PacifiCorp will distribute Highly Protected Information to only those persons qualified under paragraphs 14 and 18(a).

Objection to Access to Protected Information:

19. All persons qualified to have access to Protected Information or Highly Protected Information will have access to Highly Protected Information unless the designating party objects as provided in this paragraph. As soon as the designating party becomes aware of reasons to restrict access to a Qualified Person, the designating party must provide the Qualified Person and his or her counsel notice stating the basis for the objection. The parties must promptly confer and attempt to resolve the dispute on an informal basis.
20. If the parties are unable to resolve the matter informally, the designating party must file a written objection with the ALJ. The requesting party may file a response to the motion within 5 business days of service of an objection. The ALJ will make all reasonable efforts to resolve the matter within 10 business days of the last filing. Pending the ALJ's decision, the specific Protected Information or Highly Protected Information may not be disclosed to the person subject to the objection.

Use of Protected and Highly Protected Information:

21. All Qualified Persons must take reasonable precautions to keep Protected Information and, if applicable, Highly Protected Information, secure. Qualified Persons may reproduce Protected Information or Highly Protected Information only to the extent necessary to participate in these proceedings. A Qualified Person may discuss Protected Information or Highly Protected Information obtained under this order only with other Qualified Persons who have obtained the same information.
22. Without the written permission of the designating party, any person given access to Protected Information or Highly Protected Information under this order may not disclose Protected Information or Highly Protected Information for any purpose other than participating in these proceedings.
23. Nothing in this protective order precludes any party from independently seeking through discovery in any other administrative or judicial proceeding information or materials produced in this proceeding under this protective order.
24. Counsel of record may retain memoranda, pleadings, testimony, discovery, or other documents containing Protected Information and Highly Protected Information to the extent reasonably necessary to maintain a file of these proceedings or to comply with requirements imposed by another governmental agency or court order. Any other person retaining Protected Information must destroy or return it to the designating party within 90 days after final resolution of these proceedings unless the designating party consents in writing to retention of the Protected Information. This paragraph does not apply to the Commission or its Staff.

Duration of Protection:

25. The Commission will preserve the designation of information as Protected Information or Highly Protected Information for a period of five years from the date

of the final order in these proceedings, unless extended by the Commission at the request of the designating party. The Commission will notify the designating party at least two weeks prior to the release of Protected Information or Highly Protected Information.

CONSENT TO BE BOUND
UM 1845

I. Consent to be Bound:

This modified protective order governs the use of Protected Information and Highly Protected Information in this proceeding.

_____ (Party) agrees to be bound by the terms of the modified protective order and certifies that it has an interest in these proceedings that is not adequately represented by other parties to the proceedings.

Signature: _____

Printed Name: _____

Date: _____

II. Persons Qualified to access Protected Information under Paragraph 15:

_____ (Party) identifies the following person(s) qualified under paragraph 15.

PRINTED NAME	DATE

QUALIFICATION OF OTHER PERSONS

UM 1845

III. Persons Seeking Qualification under Paragraph 16 to access Protected Information:

I have read the modified protective order, agree to be bound by the terms of the order, and provide the following information.

Signature:		Date:
Printed Name:		
Physical Address:		
Email Address:		
Employer:		
Associated Party:		
Job Title:		
If Not employee of party, description of practice and clients:		

Signatory Page for Highly Protected Information
UM 1845

I. Persons Qualified pursuant to Paragraph 18: Highly Protected Information:

I have read the Modified Protective Order and agree to be bound by the terms of the order.

I certify that:

I understand that ORS 756.990(2) allows the Commission to impose monetary sanctions if a party subject to the jurisdiction of the Commission violates an order of the Commission.

The party I am associated with has a legitimate and non-competitive need for the Highly Protected Information for this proceeding and not simply a general interest in the information.

By: Signature: _____ Date: _____

Printed Name: _____

Address: _____

Employer: _____

Job Title: _____

By: Signature: _____ Date: _____

Printed Name: _____

Address: _____

Employer: _____

Job Title: _____

By: Signature: _____ Date: _____

Printed Name: _____

Address: _____

Employer: _____

Job Title: _____

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Motion for Modified Protective Order on the parties listed below via electronic mail and/or US mail delivery in compliance with OAR 860-001-0180.

Service List UM 1845

CAITHNESS BEAVER CREEK, LLC	
ROSS AIN CAITHNESS BEAVER CREEK, LLC 565 5TH AVE 29TH FL NEW YORK NY 10017 rain@caithnessenergy.com	DERREL GRANT CAITHNESS BEAVER CREEK, LLC 565 5TH AVE 29TH FL NEW YORK NY 10017 dgrant@caithnessenergy.com
GAIL CONBOY CAITHNESS BEAVER CREEK, LLC 565 5TH AVE 29TH FL NEW YORK NY 10017 gconboy@caithnessenergy.com	
AVANGRID RENEWABLES	
KEVIN LYNCH ADVANGRID RENEWABLES, LLC 1125 NW COUCH ST STE 700 PORTLAND OR 97209 kevin.lynch@avangrid.com	TOAN NGUYEN AVANGRID RENEWABLES, LLC 1125 NW COUCH STE 700 PORTLAND OR 97209 toan.nguyen@iberdrolaren.com
ICNU UM 1845	
TYLER C PEPPE (C) DAVISON VAN CLEVE 333 SW TAYLOR ST., SUITE 400 PORTLAND OR 97204 tcp@dvclaw.com	BRADLEY MULLINS (C) MOUNTAIN WEST ANALYTICS 333 SW TAYLOR STE 400 PORTLAND OR 97204 brmullins@mwanalytics.com
RILEY G PECK (C) DAVISON VAN CLEVE, PC 333 SW TAYLOR, STE 400 PORTLAND OR 97204 rgp@dvclaw.com	

NIPPC UM 1845	
GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE ID 83702 greg@richardsonadams.com	ROBERT D KAHN NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION PO BOX 504 MERCER ISLAND WA 98040 rkahn@nippc.org
IRION A SANGER (C) SANGER LAW PC 1117 SE 53RD AVE PORTLAND OR 97215 irion@sanger-law.com	
PACIFICORP UM 1845	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com	ERIN APPERSON (C) PACIFIC POWER 825 NE MULTNOMAH STE 800 PORTLAND OR 97232 erin.apperson@pacificorp.com
OREGON CITIZENS UTILITY BOARD	
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org	MICHAEL GOETZ (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND OR 97205 mike@oregoncub.org
ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org	
RENEWABLE NW UM 1845	
MICHAEL O'BRIEN RENEWABLE NORTHWEST 421 SW 6TH AVENUE #975 PORTLAND OR 97204 michael@renewablenw.org	SILVIA TANNER RENEWABLE NORTHWEST 421 SW 6TH AVE, STE 975 PORTLAND OR 97204 silvia@renewablenw.org

STAFF UM 1845

JOHANNA RIEMENSCHNEIDER (C)
PUC STAFF - DEPARTMENT OF
JUSTICE
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4796
johanna.riemenschneider@doj.state.or.us

LISA GORSUCH (C)
PUBLIC UTILITY COMMISSION OF
OREGON
PO BOX 1088
SALEM OR 97308
geoffrey.ihle@state.or.us

**Service List
LC 67**

COALITION LC 67	
NANCY ESTEB PO BOX 490 CARLSBORG, WA 98324 esteb44@centurylink.net	JOHN LOWE RENEWABLE ENERGY COALITION 12050 SW TREMONT ST PORTLAND, OR 97225-5430 jravenesanmarcos@yahoo.com
IRION A SANGER (C) SANGER LAW PC 1117 SE 53RD AVE PORTLAND OR 97215 irion@sanger-law.com	
ICNU LC 67	
TYLER C PEPPE (C) DAVISON VAN CLEVE 333 SW TAYLOR ST., SUITE 400 PORTLAND, OR 97204 tcp@dvclaw.com	BRADLEY MULLINS (C) MOUNTAIN WEST ANALYTICS 333 SW TAYLOR STE 400 PORTLAND, OR 97204 brmullins@mwanalytics.com
PATRICK J OSHIE (C) DAVISON VAN CLEVE PC 507 BALLARD RD. ZILLAH, WA 98953 pjo@dvclaw.com	
NATIONAL GRID	
NATHAN SANDVIG NATIONAL GRID USA 205 SE SPOKANE ST, STE 300 PORTLAND, OR 97202 nathan.sandvig@nationalgrid.com	JACK STODDARD MORGAN LEWIS & BOCKIUS ONE MARKET SPEAR STREET TOWER SAN FRANCISCO CA 94105 fjackson.stoddard@morganlewis.com
NIPPC LC 67	
ROBERT D KAHN NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION PO BOX 504 MERCER ISLAND, WA 98040 rkahn@nippc.org	STEVE KNUDSEN NIPPC 2015 SE SALMON ST PORTLAND OR 97214 sknudsen@nippc.org
SIDNEY VILLANUEVA (C) SANGER LAW, PC 1117 SE 53RD AVE PORTLAND, OR 97215 sidney@sanger-law.com	

NW ENERGY COALITION	
WENDY GERLITZ (C) NW ENERGY COALITION 1205 SE FLAVEL PORTLAND, OR 97202 wendy@nwenergy.org	FRED HEUTTE (C) NW ENERGY COALITION PO BOX 40308 PORTLAND, OR 97240-0308 fred@nwenergy.org
ODOE LC 67	
DIANE BROAD (C) OREGON DEPARTMENT OF ENERGY 625 MARION ST NE SALEM OR 97301-3737 diane.broad@state.or.us	JESSE D. RATCLIFFE (C) OREGON DEPARTMENT OF ENERGY 1162 COURT ST NE SALEM, OR 97301-4096 jesse.d.ratcliffe@doj.state.or.us
WENDY SIMONS (C) OREGON DEPARTMENT OF ENERGY 625 MARION ST NE SALEM, OR 97301 wendy.simons@oregon.gov	
OREGON CITIZENS UTILITY BOARD	
OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 dockets@oregoncub.org	MICHAEL GOETZ (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 mike@oregoncub.org
ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 bob@oregoncub.org	
PACIFICORP LC 67	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	ERIN APPERSON (C) PACIFIC POWER 825 NE MULTNOMAH STE 1800 PORTLAND, OR 97232 erin.apperson@pacificorp.com
ETTA LOCKEY PACIFIC POWER 825 NE MULTNOMAH ST., STE 2000 PORTLAND, OR 97232 etta.lockey@pacificorp.com	

PGE LC 67	
FRANCO ALBI PORTLAND GENERAL ELECTRIC 121 SW SALMON ST, 1WTC0702 PORTLAND, OR 97204 franco.albi@pgn.com	PATRICK G HAGER PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC0306 PORTLAND, OR 97204 pge.opuc.filings@pgn.com patrick.hager@pgn.com
V. DENISE SAUNDERS PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1301 PORTLAND, OR 97204 denise.saunders@pgn.com	
RENEWABLE NW LC 67	
RENEWABLE NORTHWEST 421 SW 6TH AVE., STE. 1125 PORTLAND, OR 97204 dockets@renewablenw.org	MICHAEL O'BRIEN (C) RENEWABLE NORTHWEST 421 SW 6TH AVENUE #975 PORTLAND, OR 97204 michael@renewablenw.org
SILVIA TANNER RENEWABLE NORTHWEST 421 SW 6TH AVE, STE 975 PORTLAND, OR 97204 silvia@renewablenw.org	
ROBERT J. PROCTER	
BOB PROCTER PROCTOR ECONOMICS proctereconomics@gmail.com	
SIERRA CLUB	
AMY HOJNOWSKI SENIOR CAMPAIGN REPRESENTATIVE SIERRA CLUB (503) 347-3752 amy.hojnowski@sierraclub.org	GLORIA D SMITH (C) SIERRA CLUB LAW PROGRAM 2101 WEBSTER ST STE 1300 OAKLAND, CA 94612 gloria.smith@sierraclub.org
ANA BOYD (C) SIERRA CLUB 2101 WEBSTER ST STE 1300 OAKLAND, CA 94612 ana.boyd@sierraclub.org	
STAFF LC 67	
LISA GORSUCH (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM OR 97308-1088 lisa.gorsuch@state.or.us	GEOFFREY IHLE (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 geoffrey.ihle@state.or.us

SOMMER MOSER (C)
PUC STAFF - DEPARTMENT OF JUSTICE
1162 COURT ST NE
SALEM, OR 97301
sommer.moser@doj.state.or.us

**Service List
UM 1540**

<p>GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com</p>	<p>PATRICK G HAGER PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC0306 PORTLAND, OR 97204 pge.opuc.filings@pgn.com; patrick.hager@pgn.com</p>
<p>ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 bob@oregoncub.org</p>	<p>JASON W JONES (C) PUC STAFF--DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4096 jason.w.jones@state.or.us</p>
<p>ROBERT D KAHN NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION PO BOX 504 MERCER ISLAND, WA 98040 rkahn@nippc.org</p>	<p>JIMMY LINDSAY RENEWABLE NORTHWEST PROJECT 421 SW 6TH AVE #1125 PORTLAND, OR 97204-1629 jimmy@rnp.org</p>
<p>DARRINGTON OUTAMA PORTLAND GENERAL ELECTRIC 121 SW SALMON ST, 3WTC0306 PORTLAND, OR 97204 darrington.outama@pgn.com</p>	<p>PETER J RICHARDSON (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83707 peter@richardsonadams.com</p>
<p>IRION A SANGER (C) SANGER LAW PC 1117 SE 53RD AVE PORTLAND, OR 97215 irion@sanger-law.com</p>	<p>V. DENISE SAUNDERS PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1301 PORTLAND, OR 97204 denise.saunders@pgn.com</p>
<p>DONALD W SCHOENBECK (C) REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER, WA 98660-3455 dws@r-c-s-inc.com</p>	<p>JOHN W STEPHENS ESLER STEPHENS & BUCKLEY 121 SW MORRISON ST STE 700 PORTLAND, OR 97204-3183 stephens@eslerstephens.com; mec@eslerstephens.com</p>

MARY WIENCKE
PACIFIC POWER
825 NE MULTNOMAH ST, STE 1800
PORTLAND, OR 97232-2149
mary.wiencke@pacificorp.com

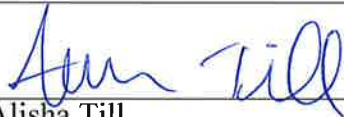
PACIFICORP, DBA PACIFIC POWER
825 NE MULTNOMAH ST, STE 2000
PORTLAND, OR 97232
oregondockets@pacificorp.com

**Service List
UE 263**

<p>OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 dockets@oregoncub.org</p>	<p>GREGORY M. ADAMS RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com</p>
<p>GREG BASS NOBLE AMERICAS ENERGY SOLUTIONS, LLC 401 WEST A ST., STE. 500 SAN DIEGO, CA 92101 gbass@noblesolutions.com</p>	<p>KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 kboehm@bkllawfirm.com</p>
<p>STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE, AR 72716-0550 stephen.chriss@wal-mart.com</p>	<p>MARIANNE GARDNER (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308-1088 marianne.gardner@state.or.us</p>
<p>KEVIN HIGGINS ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY, UT 84111-2322 khiggins@energystrat.com</p>	<p>ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 bob@oregoncub.org</p>
<p>SARAH E KAMMAN (C) PACIFIC POWER 825 NE MULTNOMAH ST STE 1800 PORTLAND, OR 97232 sarah.kamman@pacificorp.com</p>	<p>JODY KYLER COHN BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkyler@bkllawfirm.com</p>
<p>KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mcd-law.com</p>	<p>SAMUEL L ROBERTS (C) HUTCHINSON COX COONS ORR & SHERLOCK 777 HIGH ST STE 200 PO BOX 10886 EUGENE, OR 97440 sroberts@eugenelaw.com</p>

<p>TRACY RUTTEN LEAGUE OF OREGON CITIES 1201 COURT STREET NE SUITE 200 SALEM, OR 97301 trutten@orcities.org</p>	<p>IRION A SANGER (C) SANGER LAW PC 1117 SE 53RD AVE PORTLAND, OR 97215 irion@sanger-law.com</p>
<p>DONALD W SCHOENBECK (C) REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER, WA 98660-3455 dws@r-c-s-inc.com</p>	<p>NONA SOLTERO FRED MEYER STORES/KROGER 3800 SE 22ND AVE PORTLAND, OR 97202 nona.soltero@fredmeyer.com</p>
<p>DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC1301 PORTLAND, OR 97204 doug.tingey@pgn.com</p>	<p>JAY TINKER PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC-0306 PORTLAND, OR 97204 pge.opuc.filings@pgn.com</p>
<p>MICHAEL T WEIRICH (C) PUC STAFF--DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us</p>	

Dated February 16, 2018.


Alisha Till
Legal Assistant