

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
107 SE Washington St., Suite 430  
Portland, OR 97214

May 7, 2024

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY,  
2023 All-Source Request for Proposals.  
**Docket No. UM 2274**

Dear Filing Center:

Please find enclosed the Modified Protective Order Signatory Pages of the Alliance of Western Energy Consumers in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse Gorsuch  
Jesse Gorsuch

Enclosure

**APPENDIX B: QUALIFICATION OF PERSONS TO RECEIVE  
HIGHLY PROTECTED INFORMATION  
DOCKET NO. UM 2274**

**I. Consent to Be Bound—Persons Qualified pursuant to Paragraph 13: Highly Protected Information**

I have read the Modified Protective Order and agree to be bound by the terms in the order. 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. I certify that:

- (a) I am an employee of PGE or the Citizens' Utility Board of Oregon and have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information; **or**
- (b) I am not an employee of PGE or the Citizens' Utility Board of Oregon, I have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information, and I have come to a mutual agreement with PGE that I am qualified to receive Highly Protected Information; **or**
- (c) I am not an employee of PGE or the Citizens' Utility Board of Oregon, I have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information, and the Administrative Law Judge has issued a ruling allowing my qualification to receive Highly Protected Information

I provide the following information.

By: Signature: Tyler C. Pepple Date: May 7, 2024  
 Printed Name: Tyler C. Pepple  
 Physical Address: 107 SE Washington St., Suite 430, Portland, OR 97214  
 Email Address: tcp@dvclaw.com  
 Employer: Davison Van Cleve, P.C.  
 Associated Party: Alliance of Western Energy Consumers  
 Job Title: Attorney

If not employee of party, description of practice and clients:

Davison Van Cleve, associated with AWEC as legal counsel, is a law firm with business and consumer-owned utility clients throughout the western United States that provides representation before state and federal regulatory agencies.

**APPENDIX B: QUALIFICATION OF PERSONS TO RECEIVE  
HIGHLY PROTECTED INFORMATION  
DOCKET NO. UM 2274**

**I. Consent to Be Bound—Persons Qualified pursuant to Paragraph 13: Highly Protected Information**

I have read the Modified Protective Order and agree to be bound by the terms in the order. 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. I certify that:

- (a) I am an employee of PGE or the Citizens' Utility Board of Oregon and have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information; **or**
- (b) I am not an employee of PGE or the Citizens' Utility Board of Oregon, I have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information, and I have come to a mutual agreement with PGE that I am qualified to receive Highly Protected Information; **or**
- (c) I am not an employee of PGE or the Citizens' Utility Board of Oregon, I have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information, and the Administrative Law Judge has issued a ruling allowing my qualification to receive Highly Protected Information

I provide the following information.

By: Signature: Brent L. Coleman Date: May 7, 2024

Printed Name: Brent L. Coleman

Physical Address: 107 SE Washington St., Suite 430, Portland, OR 97214

Email Address: bhc@dvclaw.com

Employer: Davison Van Cleve, P.C.

Associated Party: Alliance of Western Energy Consumers

Job Title: Attorney

If not employee of party, description of practice and clients:

AWEC is an incorporated, non-profit association of large energy consumers in the United States.

Davison Van Cleve, associated with AWEC as legal counsel, is a law firm with business and consumer-owned utility clients throughout the western United States that provides representation before state and federal regulatory agencies.

**APPENDIX B: QUALIFICATION OF PERSONS TO RECEIVE  
HIGHLY PROTECTED INFORMATION  
DOCKET NO. UM 2274**

**I. Consent to Be Bound—Persons Qualified pursuant to Paragraph 13: Highly Protected Information**

I have read the Modified Protective Order and agree to be bound by the terms in the order. 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. I certify that:

- (a) I am an employee of PGE or the Citizens' Utility Board of Oregon and have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information; **or**
- (b) I am not an employee of PGE or the Citizens' Utility Board of Oregon, I have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information, and I have come to a mutual agreement with PGE that I am qualified to receive Highly Protected Information; **or**
- (c) I am not an employee of PGE or the Citizens' Utility Board of Oregon, I have a legitimate and non-competitive need for the Highly Protected Information and not simply a general interest in the information, and the Administrative Law Judge has issued a ruling allowing my qualification to receive Highly Protected Information

I provide the following information.

By: Signature: Nannette M. Moller Date: May 7, 2024

Printed Name: Nannette M. Moller

Physical Address: 4675 W. Teco Ave., Suite 230, Las Vegas, NV 89118

Email Address: nmm@dvclaw.com

Employer: Davison Van Cleve, P.C.

Associated Party: Alliance of Western Energy Consumers

Job Title: Paralegal

If not employee of party, description of practice and clients:

AWEC is an incorporated, non-profit association of large energy consumers in the United States.

Davison Van Cleve, associated with AWEC as legal counsel, is a law firm with business and consumer-owned utility clients throughout the western United States that provides representation before state and federal regulatory agencies.