



**Portland General Electric Company**  
Legal Department  
121 SW Salmon Street • 1WTC1301 • Portland, Oregon 97204  
Telephone 503-464-8544 • Facsimile 503-464-2200  
portlandgeneral.com

**Erin E. Apperson**  
Assistant General Counsel

May 19, 2021

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

Re: UM 2166 – Portland General Electric Company’s Motion for General Protective Order

Dear Filing Center:

Enclosed for filing in the above captioned docket is Portland General Electric Company’s Motion for a General Protective Order and proposed Order.

These documents are being filed by electronic mail with the Filing Center.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Erin Apperson".

Erin E. Apperson  
Assistant General Counsel

EEA: dm

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2166

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Application for Approval of an Independent  
Evaluator for 2021 All-Source Request for  
Proposals.

**PORTLAND GENERAL ELECTRIC  
COMPANY'S MOTION FOR A  
GENERAL PROTECTIVE ORDER**

Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Portland General Electric Company ("PGE") requests the issuance of a General Protective Order in this proceeding. PGE believes good cause exists for the issuance of such an order to protect commercially sensitive and confidential business information, plans, and strategies. In support of this Motion, PGE states:

1. The Commission's rules authorize PGE to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See ORCP 36(C)(1) providing protection against unrestricted discovery of trade secrets or other confidential research, development or commercial information.

2. On April 28, 2021, PGE filed its Notice and Request to Open an Independent Evaluator Selection Docket. The purpose of the filing is a solicitation process intended to address PGE's 2025 forecasted capacity shortfall of roughly 500 MWs. The public disclosure of confidential and commercially sensitive information related to the independent evaluator bids and scoring could be detrimental to PGE, its customers and RFP bidders. Public disclosure could negatively impact the competitiveness of the current RFP and future RFPs for Independent Evaluators ("IE"), and it could be damaging for bidders to potentially have their commercially

sensitive information publicly revealed to competitors. Furthermore, IE candidates who have shared their bids with PGE have requested their information be handled confidentially. Should PGE be unable to honor those IE bidder confidentiality requests, IE candidates may consider removing their bids from consideration.

3. PGE therefore respectfully requests that the Commission issue a General Protective Order to protect the confidentiality of these materials and help facilitate PGE's expedited production of relevant information during this docket. The issuance of a General Protective Order will allow PGE to provide the confidential information discussed above.

DATED this 19<sup>th</sup> day of May, 2021.

Respectfully submitted,



---

Erin E. Apperson, OSB No. 175771  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, Oregon 97204  
(503) 464-8544 phone  
(503) 464-2200 fax  
erin.apperson@pgn.com