



Portland General Electric Company

Legal Department
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
Phone 503-464-7822
Fax 503-464-2200
portlandgeneral.com

Kim S. Burton

Assistant General Counsel III
kim.burton@pgn.com

February 8, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: UE 416- Portland General Electric Company's Request for a General Rate Revision

Dear Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric Company's Motion for a General Protective Order with Expedited Consideration Requested.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads 'K S Burton'.

Kim S. Burton
Assistant General Counsel III
Portland General Electric Company
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
(503) 464-7611 (phone)
(503) 464-2200 (fax)
Email: kim.burton@pgn.com

KMB:mb

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 416

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision.

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

Expedited Consideration Requested

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 confidential market information and confidential business information, plans and strategies. In support of this Motion, PGE states:

1. PGE anticipates filing a request for a general rate revision in the near future.
2. Some of the work papers and exhibits supporting the rate case filing, including responses to Commission Staff’s Standard Data Requests, contain confidential information regarding PGE’s natural gas, electric, and coal market activities, contract terms and prices for goods and services, as well as other confidential business matters. This information is confidential commercial information and/or trade secrets under ORCP 36(C)(1).
3. PGE would like to file with the Commission a complete set of work papers and exhibits with its initial testimony, and requests expedited consideration of this motion.
4. PGE also anticipates that parties participating in this docket will make further requests for confidential information. PGE further anticipates it will be required to file periodic updates containing confidential information in this proceeding.

5. While PGE desires to provide parties with requested information, the information is of significant commercial value, and its public disclosure could be detrimental to PGE and its customers. The information discloses PGE's position, strategy, and future needs to purchase and sell electricity, natural gas, and coal. If other parties involved in the wholesale electricity, natural gas, and coal markets obtained this information, they could use it to the financial harm of PGE and its customers.

6. The Commission should, therefore, issue a Protective Order to protect the confidentiality of that material. For the reasons stated above, PGE requests that a protective order be issued in this proceeding.

DATED this 8th day of February, 2023.

Respectfully submitted,

PORTLAND GENERAL ELECTRIC COMPANY



Kim S. Burton
Assistant General Counsel III
PORTLAND GENERAL ELECTRIC COMPANY
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
Phone: 573.356.9688
Email: kim.burton@pgn.com