1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2		
3	UE 416	
4	In the Matter of	
5	PORTLAND GENERAL ELECTRIC COMPANY,	STAFF RESPONSE TO REQUEST FOR A MODIFIED PROTECTIVE ORDER
6 7	Request for a General Rate Revision.	
8	Staff of the Public Utility Commission of Oregon (Staff) submits this response to	
9	Portland General Electric Company's (PGE's) Motion for a Modified Protective Order (MPO) to	
10	protect material designated as "Highly Confidential." Staff does not object to imposition of	
11	heightened protections for Highly Confidential information but does have concern with one	
12	aspect of the protection requested by PGE for "highly sensitive infrastructure information."	
13	Under the proposed MPO Qualifying Persons would only be able to review highly sensitive	
14	infrastructure information "through physical inspection at a place identified by PGE," meaning,	
15	the Qualifying Person seeking the information would only be able to review the information by	
16	going to PGE in person. <sup>1</sup>	
17	Limiting access to highly sensitive infra	astructure information to those who can travel to
18	PGE for physical inspections is overly burdensome for Staff because Staff has assigned issues	
19	related to cyber and physical security to outside consultants that are not located in Oregon. To	
20	address this potential burden, Staff and PGE have agreed to a proposed modification to the draft	
21	MPO to allow PGE and the Qualified Person asking for the material to agree to an alternate	
22	method of inspection for highly sensitive infrastructure information." Under the proposed	
23	modification, PGE would retain the ability to limit review to physical inspection if a mutually	
24	agreeable alternative discovery option is not found.	
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26	<sup>1</sup> Portland General Electric Company Motion for	or Modified Protective Order, Appendix A, par. 4.

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Page 1 - UE 416 – STAFF RESPONSE TO MOTION FOR A MODIFIED PROTECTIVE ORDER

SSA:pjr/786027703

1	The following is the change to Paragraph 4 of proposed MPO that has been agreed to by	
2	Staff and PGE, in red-line:	
3	either through: (a) the Commission's discovery portal; (b) a password protected and encrypted electronic ZIP file distributed to Qualified Persons who have signed the appropriate protective order; (c) or through physical inspection at a place identified by PGE, or in a manner mutually agreed upon by the requestor and PGE, for material PGE identifies as highly sensitive infrastructure information.	
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7	CONCLUSION	
8	For the reasons stated above, Staff supports PGE's request for a MPO as amended by the	
9	change agreed to by PGE and Staff in this Response.	
10	DATED this 20 <sup>th</sup> day of April 2023.	
11	Respectfully submitted,	
12	ELLEN F. ROSENBLUM	
13	Attorney General	
14	/s/ Stephanie Andrus	
15	Stephanie Andrus, OSB No. 925123 Sr. Assistant Attorney General	
16	Of Attorneys for Staff of the Public Utility Commission of Oregon	
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Page 2 - UE 416 – STAFF RESPONSE TO MOTION FOR A MODIFIED PROTECTIVE ORDER  $$\rm SSA:pjr/786027703$