

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 77

In the Matter of
PACIFICORP d/b/a PACIFIC POWER,
2021 Integrated Resource Plan

SIERRA CLUB’S OBJECTION TO
DESIGNATION OF CERTAIN
INFORMATION AS CONFIDENTIAL

Sierra Club hereby objects to PacifiCorp’s designation of the following record as confidential: **Confidential Attachment to Staff Data Request 097**. This spreadsheet provides projected greenhouse gas emissions from Jim Bridger units 1 and 2 between 2021 and 2037. This information cannot be reasonably classified as confidential because greenhouse gas emissions are not typically withheld from the public as “trade secret[s] or other confidential research, development, or commercial information.”¹ For example, PacifiCorp reports its actual greenhouse gas emissions at Jim Bridger to the U.S. Environmental Protection Agency (“EPA”), which makes that information publicly available through the EPA’s Clean Air Markets Database.² Accordingly, disclosure cannot be shown to cause PacifiCorp competitive disadvantage or otherwise harm customers.

Sierra Club certifies that it made reasonable efforts to achieve informal resolution. Specifically, Sierra Club’s counsel contacted counsel for PacifiCorp on January 28, 2022, January 31, 2022, and February 4, 2022 in an attempt to informally resolve this issue. However, such attempts have not been successful.

¹ ORCP 36(C)(1).

² U.S. Env’tl. Prot. Agency, Clean Air Markets Database, <https://ampd.epa.gov/ampd/>.

Dated: February 22, 2022

Respectfully submitted,

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