

1  
2  
3  
4  
5 BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

6 UM 1002

7  
8 WAH CHANG,

9 Petitioner,

10 v.

11 PACIFICORP,

12 Respondent.  
13

DECLARATION OF SUSAN K.  
ROBERTS In Support Of PacifiCorp's  
Response to Wah Chang's Motion to  
Exclude Information From Protective  
Order

14 I, Susan K. Roberts, declare:

15 1. I am a paralegal with the law firm Perkins Coie LLP, which represents PacifiCorp  
16 in this matter.

17 2. I make this Declaration based on personal knowledge in support of PacifiCorp's  
18 Response to Wah Chang's Motion to Exclude Information from Protective Order.

19 3. I have had primary responsibility for the production of PacifiCorp's documents  
20 produced in response to the 15 sets of data requests Wah Chang served on PacifiCorp in this  
21 proceeding. PacifiCorp has produced 75,269 numbered documents and CD ROMs. Since May  
22 2005, PacifiCorp has produced over 70,000 pages of responsive materials. This number includes  
23 39,306 individually numbered pages of emails produced on two (2) CD ROMs and 30,813 pages  
24 of conventional paper. In addition to the paper production and two (2) CD ROMs of emails,  
25 PacifiCorp produced an additional seven (7) CD ROMs containing data such as Excel  
26 spreadsheets and wav. files of audio conversations. These seven (7) CD ROMs contain the

1 equivalent of approximately 106,725 pages of additional paper if conventionally printed, not  
2 including the wav. files. In total, PacifiCorp has produced the equivalent of 181,994 pages of  
3 materials, plus additional electronic files that cannot be converted to paper equivalents.

4 4. I reviewed Robert McCullough's direct testimony, WC/800, and exhibits as  
5 submitted by Wah Chang on December 15, 2005 and amended on December 29, 2005. I created  
6 a matrix which charted for each exhibit submitted by Wah Chang the following information: the  
7 form submitted to the OPUC (paper or electronic); the total number of paper pages submitted;  
8 whether or not the exhibits were cited in Mr. McCullough's testimony; if so, at what page, line  
9 and/or footnote in the testimony the exhibits appeared; and exactly how many pages of a multiple  
10 page exhibit were actually cited in Mr. McCullough's testimony.

11 5. Regarding Wah Chang's electronic submissions, I submitted the eight (8) CD  
12 ROMs and one (1) DVD to BridgeCity Legal Copy Service. The staff at BridgeCity Legal  
13 performed diagnostic testing and provided a report for each CD ROM and the DVD indicating  
14 the total number of pages each CD ROM and the DVD would generate if printed on paper. I  
15 added the diagnostic information into my matrix for the CD ROMs and DVD and included the  
16 information in the number of total pages submitted by Wah Chang to the OPUC.

17 6. Wah Chang's Motion to Exclude seeks to exclude 28 exhibits from the Protective  
18 Order. These 28 exhibits include the equivalent of over 110,000 pages of documents, plus  
19 additional electronic files. Of the 28 exhibits that Wah Chang seeks to exclude from the  
20 Protective Order, 18 are not cited at all in the testimony of Robert McCullough, WC/800. Others  
21 of the 28 exhibits are lengthy documents of which only a few pages are cited in Mr.  
22 McCullough's testimony. See Appendix 1 to PacifiCorp's Motion to Strike Petitioner's Direct  
23 Testimony and Exhibits.

24 7. Exhibit WC/905 contains approximately 453 pages of Excel spreadsheets.  
25 Exhibit WC/906 contains approximately 98,828 pages of Excel spreadsheets. Exhibit WC/907  
26 contains 8,321 pages of trading blotters.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**

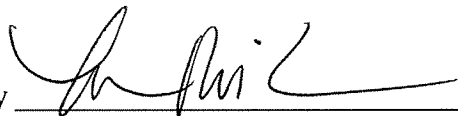
I certify that I have this day served the foregoing document, encaptioned  
DECLARATION OF SUSAN K. ROBERTS IN SUPPORT OF PACIFICORP'S RESPONSE  
TO WAH CHANG'S MOTION TO EXCLUDE INFORMATION FROM PROTECTIVE  
ORDER, by causing a copy to be sent via U.S. Mail and electronic mail to:

Richard H. Williams  
Milo Petranovich  
Lane Powell Spears Lubersky LLP  
Suite 2100  
601 S.W. Second Avenue  
Portland, OR 97204  
Email: williamsr@lanepowell.com  
petranovichm@lanepowell.com

Paul Graham  
Assistant Attorney General  
Department of Justice  
Regulated Utility & Business Section  
1162 Court St. NE  
Salem, OR 97301-4096  
Email: paul.graham@state.or.us

DATED: March 16, 2006.

**PERKINS COIE LLP**

By   
Lawrence H. Reichman, OSB No. 86083  
Chris Garrett, OSB No. 03100

Attorneys for PacifiCorp