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October 19, 2011

Via Electronic and U.S. Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY
2012 Annual Power Cost Update Tariff (Schedule 125)
Docket No. UE 228

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Confidential Renewed Motion Challenging Confidential Designation on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Confidential hard copies are being provided to those parties who have signed the protective order in this docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Sarah A. Kohler
Sarah A. Kohler

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Renewed Motion Challenging Confidential Designation on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 19th day of October, 2011.

/s/ Sarah A. Kohler

Sarah A. Kohler

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 228

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	ICNU’S CONFIDENTIAL RENEWED
COMPANY)	MOTION CHALLENGING
)	CONFIDENTIAL DESIGNATION
)	
2012 Annual Power Cost Update Tariff)	
(Schedule 125))	
)	
)	
_____)	

I. INTRODUCTION

Pursuant to Protective Order No. 11-102 (the “Protective Order”) and through this motion, the Industrial Customers of Northwest Utilities (“ICNU”) hereby renews its motion objecting to and challenging the designation of certain information as confidential in this proceeding. For all the reasons discussed in ICNU’s August 29, 2011 Motion Challenging Confidential Designation, ICNU moves that the overall hedging disallowance adjustment ICNU witness Don Schoenbeck proposed in this Docket be subject to public disclosure because the proposed adjustment number is not a confidential piece of data. Under the Protective Order, PGE now bears the burden of showing that the challenged information is covered under ORCP 36(C)(7).

ICNU wishes to clarify that it did not change its proposed disallowance in its Reply Brief, but rather, offered an alternative approach to its proposed disallowance. Thus, ICNU proposes that the original disallowance figure of [Confidential] [REDACTED]

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CONFIDENTIAL DESIGNATION

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[Confidential] not be designated as confidential. In addition, because ICNU's alternative recommendation is derived from its original proposed disallowance, ICNU's alternative recommendation of [Confidential] [redacted] [Confidential] should also be removed from confidential status. Therefore, both the proposed [Confidential] [redacted] [redacted] [Confidential] disallowance recommendations should not be designated as confidential.

CONCLUSION

WHEREFORE, for the reasons stated herein, ICNU respectfully requests that the Commission remove the confidential designation attached to ICNU witness Don Schoenbeck's overall proposed hedging disallowance adjustment as well as ICNU's alternative disallowance contained in its Reply Brief and make these numbers publically available.

Dated this 19th day of October, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C

/s/ Melinda J. Davison

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