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July 23, 2021

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: UE 394 – In the Matter of Portland General Electric Company, Request for a General Rate Case

Dear Filing Center:

Enclosed for filing in the above captioned docket is Portland General Electric Company's Motion for Modified Protective Order and Proposed Modified Protective Order, with expedited consideration requested. These documents are being filed by electronic mail with the Filing Center.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Loretta Mabinton".

Loretta Mabinton
Associate General Counsel

LM:dm
[Enclosure]

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 394

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision.

**MOTION FOR MODIFIED
PROTECTIVE ORDER**

Expedited Consideration Requested

I. INTRODUCTION

Under OAR 860-001-0420 and OAR 860-001-0080(3), Portland General Electric Company (PGE or Company) moves the Public Utility Commission of Oregon (Commission) for entry of a Modified Protective Order to supplement the Commission’s General Protective Order¹ in PGE’s Request for a General Rate Revision proceeding – UE 394. Specifically, PGE requests the Administrative Law Judge (ALJ) issue the Modified Protective Order attached as Appendix A to this motion. A Modified Protective Order would provide additional protection for highly confidential, sensitive, non-public information in this proceeding.

II. BACKGROUND

On June 24, 2021 the Administrative Law Judge granted Protective Order No. 21-206 in this proceeding. On July 9, 2021 PGE filed an application for a general rate revision. The issues in this case include information that PGE regards as highly confidential, including agreements with third parties that impose confidentiality obligations on PGE. Although, PGE is in the early stages of this proceeding, it is possible that highly confidential information will be requested by parties

¹ See Order No. 21-206

in discovery during the course of this proceeding. With a Modified Protective Order in place, PGE will be able to respond quickly to discovery.

II. REQUEST FOR ADDITIONAL PROTECTION

OAR 860-001-0080(3) contains five requirements for seeking a modified protective order. This motion addresses each of these requirements in the following subsections.

A. Parties and Exact Nature of the Information Involved (OAR 860-001-0080(3)(a)(A)).

At the time of this motion, the parties to this case are Commission Staff (Staff), Oregon Citizens' Utility Board (CUB), the Alliance of Western Energy Consumers (AWEC), and Calpine Energy Solutions. This proceeding will implicate highly confidential information related to PGE's generation resources and related third party contracts. Public disclosure of this information would harm PGE and its customers by: (1) violating confidentiality obligations to third parties; and (2) disrupt PGE's efforts in negotiations relating to generation resources and put PGE at a commercial disadvantage. As noted above, it is possible that highly confidential information, including information that PGE classifies as Critical Energy Infrastructure Information ("CEII"), will be requested by parties in discovery during the course of this proceeding. PGE will be able to expedite its response to discovery with a Modified Protective Order in place.

B. Legal Basis for the Claim the Information is Protected under ORCP 36(C)(1) (OAR 860-001-0080(3)(a)(B)).

ORCP 36(C)(1) provides protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information." As discussed above, PGE expects to discuss sensitive commercial information including PGE's ongoing negotiations for a bilateral agreement including specific highly sensitive pricing information that if disclosed could harm PGE's current and future procurement efforts.

A “trade secret” is information, including cost data, that: (a) derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.²

In addition, the Oregon Public Records Law exempts from disclosure public records that are “trade secrets” that:

[M]ay include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within an organization and which is used in a business it conducts, having actual or potential commercial value, and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.³

In docket UE 374, PacifiCorp’s Request for a General Rate Revision, the Commission entered a modified protective order to cover similar information—highly sensitive contractual and financial information⁴ regarding PacifiCorp’s coal generation resources.

PGE seeks this Modified Protective Order so that it can designate the commercially sensitive information as highly confidential information and minimize the risk of violating obligations to third parties under existing agreements and otherwise comply with applicable law.

C. Exact Nature of the Relief Requested (OAR 860-001-0080(3)(a)(C)).

The Company requests that the Commission enter the attached Modified Protective Order. The Modified Protective Order will protect the highly confidential information by limiting access to the following: Staff and its counsel, Citizens’ Utility Board of Oregon (CUB) and its counsel, and counsel for other parties in this docket who seek to be qualified. Additionally, paragraph 14

² See Uniform Trade Secrets Act, ORS 646.461 to 646.475.

³ ORS 192.345(2). See generally, ORS 192.410 to 192.505.

⁴ See Order No. 20-131.

of Attachment A outlines a process for additional parties to seek access to Highly Confidential Information on a case-by-case basis. The Commission and the ALJ assisting the Commission would also have access to Highly Confidential Information.

The proposed Modified Protective Order also requires that Highly Confidential Information be maintained in a manner distinct and more restrictive than that classified as either non-confidential information or Protected Information. Previously, Highly Confidential Information was printed on a color of paper that distinguishes it from Protected Information and public information. Like Protected Information, Highly Confidential Information must be stored in a locked room or cabinet, and Highly Confidential Information may not be used or disclosed for any purpose other than participation in this proceeding. However, the Chief ALJ outlined new measures for handling confidential information stating that until and unless the OPUC Filing Center changes the process, Confidential Information will be received and distributed electronically, consistent with the Agency's COVID-19 response as reflected in Order No. 20-088. Therefore, the proposed Modified Protective Order outlines this treatment of highly confidential information.

PGE requests that the Commission enter the proposed Modified Protective Order that is included in this Motion as Attachment A. The terms of the Modified Protective Order are narrowly tailored and intended to apply only to PGE's most sensitive information. The proposed Modified Protective Order will allow the transmission of such information to the parties that sign the Modified Protective Order. By identifying specific individuals qualified to access Highly Protected Information, the parties to the Modified Protective Order will have certainty regarding the permissible, but limited, disclosure of Highly Protected Information.

D. Specific Reasons the Relief Requested is Necessary (OAR 860-001-0080(3)(a)(D)).

The requested Modified Protective Order will protect against widespread disclosure of commercially sensitive information that is protectable under law while enabling PGE to make information available consistent with the highly sensitive nature of the information. Granting the request will enable PGE to respond to discovery quickly without pausing to obtain further protection in the middle of discovery. The goal of PGE's proposed protections is to minimize the number of persons who have access to the Highly Confidential Information and to ensure that it does not fall into the hands of market participants or get used in commercial negotiations.

PGE asks that the Highly Confidential Information be made available only to Staff and its counsel, CUB and its counsel, counsel for other parties in this docket who seek to be qualified, and, if deemed necessary and appropriate, other parties on a case-by-case basis. This approach will strike a balance, ensuring that those parties charged by the legislature with protecting the public and customer interests have an opportunity to fully vet information such as specific pricing information and terms and conditions unique to the resource transactions, while at the same time providing PGE with the ability to protect the integrity of its contracts.

The additional protection provided by the Modified Protective Order will allow the Parties access to the information in a manner that protects highly sensitive commercial information. The requested Modified Protective Order will also help reduce the risk of an inadvertent disclosure of the highly sensitive information. The General Protective Order is insufficient as it is general in nature and does not have adequate safeguards to protect highly confidential information. Reliance on the General Protective Order could also delay discovery as PGE may otherwise require a pause to obtain adequate protection during the proceeding.

E. Description of the Intermediate Measures Explored by the Parties (OAR 860-001-0080(3)(a)(E)).

The standard protective order will be insufficient to protect PGE's highly sensitive confidential information. Intermediate measures have not been taken as PGE is making this motion as a proactive step that will facilitate discovery. As explained above, it is necessary to limit access to specific highly confidential information to protect among other things, PGE's obligations to third parties.

F. Certification of Conferring with Parties (OAR 860-001-0080(3)(a)(F))

PGE provided notice on July 22, 2021 to the following parties who have intervened in this proceeding: Staff, CUB, Calpine and AWEC. At the time of filing, no party has stated an objection to this motion.

III. CONCLUSION

For the foregoing reasons, PGE respectfully requests that the Commission issue a Modified Protective Order in the format provided as Appendix A to this Motion for the purposes of docket UE 394.

DATED this 23rd day of July, 2021.

Respectfully submitted,



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(503) 464-2354 (fax)
Email: loretta.mabinton@pgn.com

ORDER NO.

Attachment A: Proposed Modified Protective Order

MODIFIED PROTECTIVE ORDER
UE 394

Scope of this Order:

1. This order supplements General Protective Order No. 21-206 and governs the acquisition and use of “Highly Confidential Information” produced or used by any party to docket UE 394.

Designation of Highly Confidential Information

2. Any party may designate as Highly Confidential Information any information the party reasonably determines:
 - (a) Falls within the scope of ORCP 36(C)(1) (a trade secret or other confidential research, development, or commercial information);
 - (b) Is not publicly available; and
 - (c) Is not adequately protected by the general protective order.
3. To designate information as Highly Confidential Information, a party must place the following legend on the material:

HIGHLY CONFIDENTIAL INFORMATION
SUBJECT TO MODIFIED PROTECTIVE ORDER NO. 21-____

The party should make reasonable efforts to designate as Highly Confidential Information only the portions of the information that satisfies paragraph 2 of this Modified Protective Order.

4. Until and unless the OPUC Filing Center changes the process, all Highly Confidential Information in OPUC Docket UE 394 will be filed with the OPUC Filing Center (puc.filingcenter@state.or.us) with a password protected and encrypted electronic ZIP file and distributed to parties electronically who have signed the appropriate protective order, consistent with the Commission’s COVID-19 response, as reflected in Order No. 20-088 and the Chief Administrative Law Judge’s letter dated March 26, 2020.
5. For a filing containing Highly Protected Information, a Highly Protected version and a public version of the document must be created and filed with the Filing Center. The Highly Protected versions of documents shall be grouped together and should be clearly marked as Highly Confidential. The Commission’s Filing Center receives files electronically outside of the Huddle program. For discovery containing Highly Protected Information, the file should be uploaded to Huddle file folder designated “Highly Protected.”
6. A party may designate as Highly Confidential Information any information previously provided by giving written notice to the Commission and other parties. Parties in possession of newly designated Highly Confidential Information must make reasonable efforts that all copies of the material containing the information bear the above legend if requested by the designating party.

7. A designating party must make reasonable efforts to ensure that information designated as Highly Confidential Information continues to warrant protection under this order. If designated information becomes publicly available or no longer falls within the scope of ORCP 36(C)(1), the designating party should make reasonable efforts to remove the protected designation and provide written notice to the Commission and other parties.

Challenge to Designation of Information as Highly Confidential:

8. A party may informally challenge any designation of Highly Confidential Information by notifying the designating party. Once notified, the designating party bears the burden of showing that the challenged information is covered by ORCP 36(C)(1) and that the “Highly Confidential Information” designation is necessary. Any party that request that the ALJ hold a conference to help resolve disputes about proper designation.
9. If the dispute cannot be resolved informally, the challenging party may file a written objection with the ALJ. The objection need only identify the information in dispute and certify that reasonable efforts to achieve informal resolution have failed.
10. Within five business days of service of the objection, the designating party must either remove the protected designation or file a written response. A written response must identify the factual and legal basis of how the challenged information is protected under the Oregon Public Records Act, ORS 192.410 et seq, or the Uniform Trade Secrets Act, ORS 646.461(4). Broad allegations unsubstantiated by specific facts are not sufficient. If the designating party does not timely respond to the objection, the Commission will remove the protected designation from the challenged information.
11. The challenging party may file a written reply to any response within five business days of service of an objection. The designating party may file a sur-reply within three business days of service of a response. The ALJ will make all reasonable efforts to resolve the matter within 10 business days of service of the last filing.

Access to Highly Confidential Information:

12. Only Qualified Persons may access Highly Confidential Information designated by another party under this Modified Protective Order. Persons automatically bound and qualified to access Highly Confidential Information are:
 - a. Commission employees; and
 - b. Assistant Attorneys General assigned to represent the Commission.
13. Persons qualified to access Highly Confidential Information upon a signing the Consent to be Bound section of Appendix B are:
 - a. An employee or counsel of the Citizens Utility Board of Oregon; or
 - b. Counsel for the party.

A party must identify all these persons in section 2 of Appendix B when consenting to be bound by the order, and must update this list throughout the proceeding to ensure it accurately identifies Qualified Persons.

14. A party bound by the General Protective Order in this docket may seek to qualify persons other than those described in Paragraphs 12 and 13 to access specific Highly Confidential Information by having each such person complete and sign Appendix B and submitting the Appendix to the designating party and to the Commission. Within 10 business days of receiving a signed copy of Appendix B, the designating party either must provide access to the requested Highly Confidential Information to the person who signed Appendix B or must file an objection under Paragraph 15.

Objection to Access to Highly Confidential Information:

15. All persons qualified to have access to Highly Confidential Information will have access to Highly Confidential Information unless the designating party objects as provided in this paragraph. As soon as the designating party becomes aware of reasons to restrict access to a Qualified Person, or objects to a person seeking qualification under Paragraphs 13 or 14, the designating party must provide the person and his or her counsel notice stating the basis for the objection. The parties must promptly confer and attempt to resolve the dispute on an informal basis.
16. If the parties are unable to resolve the matter informally, the designating party must file a written objection with the ALJ. The requesting party may file a response to the motion within 5 business days of service of an objection. The ALJ will make all reasonable efforts to resolve the matter within 10 business days of the last filing. Pending the ALJ's decision, the specific Highly Confidential Information may not be disclosed to the person subject to the objection.

Use of Highly Confidential Information:

17. All Qualified Persons must take reasonable precautions to keep Highly Confidential Information secure. Qualified Persons may reproduce Highly Confidential Information to the extent necessary to participate in these proceedings. A Qualified Person may discuss Highly Confidential Information obtained under this order only with other Qualified Persons who have obtained the same information under this order.
18. Without the written permission of the designating party, any person given access to Highly Confidential Information under this order may not disclose Highly Confidential Information for any purpose other than participating in these proceedings.
19. Nothing in this protective order precludes any party from independently seeking through discovery in any other administrative or judicial proceeding information or materials produced in this proceeding under this protective order.
20. Counsel of record may retain memoranda, pleadings, testimony, discovery, or other documents containing Highly Confidential Information to the extent reasonably necessary to maintain a file of these proceedings or to comply with requirements imposed by another governmental agency or court order. Any other person retaining Highly Confidential Information must destroy or return it to the designating party within 90 days after final resolution of these proceedings unless the designating party consents in writing to retention of the Highly Confidential Information. This paragraph does not apply to the Commission or its staff.

Duration of Protection:

21. The Commission will preserve the designation of information as Highly Confidential Information or Highly Confidential Information for a period of five years from the date of the final order in these proceedings, unless extended by the Commission at the request of the designating party. The Commission will notify the designating party at least two weeks prior to the release of Confidential Information or Highly Confidential Information.

**APPENDIX B: QUALIFICATION OF PERSONS TO RECEIVE
HIGHLY CONFIDENTIAL INFORMATION
DOCKET NO. UE 394**

I. Consent to Be Bound—Persons Qualified pursuant to Paragraph 13: Highly Confidential Information

I have read the Modified Protective Order and agree to be bound by the terms in the order. I understand that ORS 756.990(2) allows the Commission to impose monetary sanctions if a party subject to the jurisdiction of the Commission violates an order of the Commission. I certify that:

- (a) I am an employee of the Citizens Utility Board of Oregon, and have a legitimate and non-competitive need for the Highly Confidential Information and not simply a general interest in the information; **or**
- (b) I am not an employee of the Citizens Utility Board of Oregon and PGE and I am qualified to receive Highly Confidential Information; **or**
- (c) I am not an employee of the Citizens Utility Board of Oregon and PGE has not objected to allowing my qualification to receive Highly Confidential Information, or the ALJ has issued a ruling granting my access to receive Highly Confidential Information.

I provide the following information.

By: Signature: _____ Date: _____

Printed Name: _____

Physical Address: _____

Email Address: _____

Employer: _____

Associated Party: _____

Job Title: _____

If not employee of party, description of practice and clients:

ORDER NO.

Attachment A: Proposed Modified Protective Order

MODIFIED PROTECTIVE ORDER
UE 394

Scope of this Order:

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Designation of Highly Confidential Information

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 - (c) Is not adequately protected by the general protective order.
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The party should make reasonable efforts to designate as Highly Confidential Information only the portions of the information that satisfies paragraph 2 of this Modified Protective Order.

4. Until and unless the OPUC Filing Center changes the process, all Highly Confidential Information in OPUC Docket UE 394 will be filed with the OPUC Filing Center (puc.filingcenter@state.or.us) with a password protected and encrypted electronic ZIP file and distributed to parties electronically who have signed the appropriate protective order, consistent with the Commission’s COVID-19 response, as reflected in Order No. 20-088 and the Chief Administrative Law Judge’s letter dated March 26, 2020.
5. For a filing containing Highly Protected Information, a Highly Protected version and a public version of the document must be created and filed with the Filing Center. The Highly Protected versions of documents shall be grouped together and should be clearly marked as Highly Confidential. The Commission’s Filing Center receives files electronically outside of the Huddle program. For discovery containing Highly Protected Information, the file should be uploaded to Huddle file folder designated “Highly Protected.”
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7. A designating party must make reasonable efforts to ensure that information designated as Highly Confidential Information continues to warrant protection under this order. If designated information becomes publicly available or no longer falls within the scope of ORCP 36(C)(1), the designating party should make reasonable efforts to remove the protected designation and provide written notice to the Commission and other parties.

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9. If the dispute cannot be resolved informally, the challenging party may file a written objection with the ALJ. The objection need only identify the information in dispute and certify that reasonable efforts to achieve informal resolution have failed.
10. Within five business days of service of the objection, the designating party must either remove the protected designation or file a written response. A written response must identify the factual and legal basis of how the challenged information is protected under the Oregon Public Records Act, ORS 192.410 et seq, or the Uniform Trade Secrets Act, ORS 646.461(4). Broad allegations unsubstantiated by specific facts are not sufficient. If the designating party does not timely respond to the objection, the Commission will remove the protected designation from the challenged information.
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13. Persons qualified to access Highly Confidential Information upon a signing the Consent to be Bound section of Appendix B are:
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A party must identify all these persons in section 2 of Appendix B when consenting to be bound by the order, and must update this list throughout the proceeding to ensure it accurately identifies Qualified Persons.

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18. Without the written permission of the designating party, any person given access to Highly Confidential Information under this order may not disclose Highly Confidential Information for any purpose other than participating in these proceedings.
19. Nothing in this protective order precludes any party from independently seeking through discovery in any other administrative or judicial proceeding information or materials produced in this proceeding under this protective order.
20. Counsel of record may retain memoranda, pleadings, testimony, discovery, or other documents containing Highly Confidential Information to the extent reasonably necessary to maintain a file of these proceedings or to comply with requirements imposed by another governmental agency or court order. Any other person retaining Highly Confidential Information must destroy or return it to the designating party within 90 days after final resolution of these proceedings unless the designating party consents in writing to retention of the Highly Confidential Information. This paragraph does not apply to the Commission or its staff.

Duration of Protection:

21. The Commission will preserve the designation of information as Highly Confidential Information or Highly Confidential Information for a period of five years from the date of the final order in these proceedings, unless extended by the Commission at the request of the designating party. The Commission will notify the designating party at least two weeks prior to the release of Confidential Information or Highly Confidential Information.

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HIGHLY CONFIDENTIAL INFORMATION
DOCKET NO. UE 394**

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I have read the Modified Protective Order and agree to be bound by the terms in the order. I understand that ORS 756.990(2) allows the Commission to impose monetary sanctions if a party subject to the jurisdiction of the Commission violates an order of the Commission. I certify that:

- (a) I am an employee of the Citizens Utility Board of Oregon, and have a legitimate and non-competitive need for the Highly Confidential Information and not simply a general interest in the information; **or**
- (b) I am not an employee of the Citizens Utility Board of Oregon and PGE and I am qualified to receive Highly Confidential Information; **or**
- (c) I am not an employee of the Citizens Utility Board of Oregon and PGE has not objected to allowing my qualification to receive Highly Confidential Information, or the ALJ has issued a ruling granting my access to receive Highly Confidential Information.

I provide the following information.

By: Signature: _____ Date: _____

Printed Name: _____

Physical Address: _____

Email Address: _____

Employer: _____

Associated Party: _____

Job Title: _____

If not employee of party, description of practice and clients:
