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Via Electronic Filing

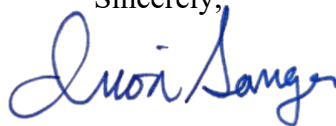
Oregon Public Utility Commission
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: AR 641 Rule Redline

Dear Chief Administrative Law Judge Nolan Moser:

The Northwest & Intermountain Power Producers Coalition provides the attached rule redline to codify the Oregon Public Utility Commission's (the "OPUC") existing policy regarding access to confidential material in requests for proposal proceedings. This policy was reaffirmed in OPUC Order No. 18-080 in Docket No. UM 1845.

Sincerely,



Irion A. Sanger

AR 641 AHD Redlines

860-001-0070

Confidential Information

(1) This rule applies to information submitted under a claim of confidentiality under the Public Records Law, but does not apply to information designated as confidential under a protective order in a contested case proceeding.

(2) At the time of submission, a person may designate a document or portion of a document as containing confidential information. A designation must be made in good faith and be limited to information that qualifies for protection. The person asserting confidentiality must state the legal basis for the claim of confidentiality.

(3) Unless otherwise provided by Commission order, confidential information submitted under this rule must be clearly labeled on each electronic page as confidential and identified as confidential in the document name. The confidential information on each page must be clearly marked by inserting [Confidential] before and after the portion of information that is confidential. The container must be marked "CONFIDENTIAL."

(4) Confidential information submitted to the Commission is exempt from public disclosure to the extent provided under the Public Records Law, ORS 192.410 through 192.505.

(5) The Commission recognizes the importance of allowing stakeholders to participate and access confidential information to further the public interest. In the event of a Request for Proposal, non-bidders may: (a) access confidential information by signing the appropriate protective order, if any, and (b) participate in shortlist acknowledgement to voice concerns while the Commission is actively considering the shortlist, rather than affect the bidding has completed.

(6) Any failure to comply with the requirements in this rule may result in the submission not being treated as including confidential information or being returned to the provider for correction and resubmission.

860-001-0170

Filing Requirements in Contested Case and Declaratory Ruling Proceedings

(1) Every pleading or other document submitted to the Commission in contested case or declaratory ruling proceedings must be filed electronically with the Filing Center on or before the date due. All filings must be labeled with the applicable docket number, a description of the filing, and the date filed. Electronic copies of public documents must not be password protected, or have any PDF security features enabled.

(a) Documents may be electronically filed by sending the filing as an attachment to an electronic mail message addressed to the Filing Center or by personally delivering or mailing a portable data storage device to the Filing Center. If a portable data storage device is delivered or mailed to the Filing Center, it must be received on or before the date due to be considered timely filed.

(b) Electronic copies of documents must be in text-searchable format and provided in either Microsoft Word, Microsoft Excel, or .pdf (Adobe Acrobat) format, unless otherwise permitted by the ALJ.

(c) The subject line of each electronic mail message to the Filing Center must include the docket number (if one is assigned), the party name or identifier, and the title or type of filing.

(d) If a document relates to multiple dockets that are officially consolidated, then the filer should file the document in the lead docket only. If a document relates to multiple dockets that are not officially consolidated, then the filer must file the document in each docket, even if all dockets are following the same procedural schedule.

(e) When filing a document that is entirely confidential, the filer must electronically file a cover letter.

(f) A document may contain highly confidential material. Persons qualified to access highly confidential material in the case of a request for proposal shall include: (a) an employee or counsel of the Regulatory Division at the Oregon Citizens' Utility Board; and (b) persons that are not involved in the utility's ongoing solicitation process as bidders, including persons who represent or advise bidders on unrelated matters.