

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

LC 73

In the Matter of

PORTLAND GENERAL  
ELECTRIC COMPANY,

2019 Integrated Resource Plan.

**PORTLAND GENERAL ELECTRIC  
COMPANY'S OBJECTION TO NORTHWEST  
AND INTERMOUNTAIN POWER  
PRODUCERS COALITION'S REQUEST TO  
DESIGNATE HENRY TILGHMAN AS A  
QUALIFIED CONSULTANT UNDER ORDER  
NO. 19-186**

Under Section 15 of the Public Utility Commission of Oregon (Commission), General Protective Order No. 19-186, issued in the above-captioned docket, Portland General Electric Company (PGE) objects to Northwest and Intermountain Power Producers Coalition's (NIPPC) request to designate Henry Tilghman as a qualified consultant.

On June 6, 2019, NIPPC filed signatory pages under General Protective Order No. 19-186 for its legal counsel. On June 6, 2019, NIPPC also filed a request to designate Mr. Tilghman as a qualified consultant under the General Protective Order<sup>1</sup>. PGE objects to the designation of Mr. Tilghman as a qualified consultant under the General Protective Order because Mr. Tilghman and his consulting company, Tilghman Associates, represent industrial customers, electricity service suppliers (ESS), and independent power producers, some of whom are competitors in the wholesale electric market and may participate as bidders in PGE's request for proposals that may be issued to implement the action plan in this proceeding. Accordingly, disclosure of the protected sensitive information would put PGE and its customers at a significant commercial disadvantage.

Some of the information that PGE will disclose in the IRP is extremely commercially sensitive information that will give Mr. Tilghman's clients (potential competitors of PGE) an unfair advantage over PGE and its customers. For example, historically, PGE discloses hourly price forecast data in the IRP. Not only would such data flow into the scoring in PGE's RFP, it is also data that, on a bilateral basis, puts PGE and its customers at a competitive disadvantage in resource procurement.

PGE contacted NIPPC's counsel in an attempt to resolve the issue of PGE's objection to Mr. Tilghman's signing of the Protective Order. NIPPC granted PGE until June 13, 2019 to file its objection if the dispute is not resolved. PGE and NIPPC continue to work on resolving the dispute but have not achieved resolution yet.

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<sup>1</sup> Attached as Attachment A.

PGE may withdraw or modify this objection if the parties reach a mutually satisfactory resolution of this dispute.

### CONCLUSION

Given the unreasonable commercial risk, PGE respectfully requests that the Commission deny access to commercially sensitive information in PGE's IRP to Mr. Tilghman.

DATED this 13th day of June, 2019.

Respectfully submitted,




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**QUALIFICATION OF OTHER PERSONS**  
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**III. Persons Seeking Qualification under Paragraph 13:**

I have read the general protective order, agree to be bound by the terms of the order, and provide the following information.

<b>Signature:</b>		<b>Date:</b> 6/5/19
<b>Printed Name:</b>	Henry Tilghman	
<b>Physical Address:</b>	1816 NE 53rd Ave; Portland, OR; 97213	
<b>Email Address:</b>	hrt@tilghmanassociates.com	
<b>Employer:</b>	Tilghman Associates	
<b>Associated Party:</b>	NIPPC	
<b>Job Title:</b>	Principal Consultant	
<b>If not employee of party, description of practice and clients:</b>	<p>In my practice, I provide management and policy consulting on issues related to the energy industry. Topical areas include transmission service and interconnection; transmission planning; transmission rates; resource adequacy; market design; gas-electric interface; and integration of renewable energy.</p> <p>Clients include NIPPC, National Grid, and EDP Renewables.</p>	