

July 30, 2020

Via Electronic Mail

Public Utility Commission of Oregon Attention: Filing Center P.O. Box 1088 Salem, OR 97308-1088

Re: UM XXXX - PGE 2019 Renewable Portfolio Standard Compliance Report

Dear Filing Center;

Enclosed please find Portland General Electric Company's ("PGE") 2019 Renewable Portfolio Standard ("RPS") Compliance Report and Motion for a Protective Order with Proposed Protective order. PGE's RPS report is submitted pursuant to OAR 860-083-0350 and ORS 469A.170 and provides information about how PGE has met its 2019 RPS target.

Attachment A contains protected information and will be submitted to the filing center after approval of a Protective Order. Attachments B through F have been provided electronically to puc.workpapers@state.or.us.

If you have any questions or require further information, please call Jaki Ferchland at (503) 464-7488 or Richard George at (503) 464-7611. Please direct all formal correspondence and requests to the following email addresses: richard.george@pgn.com and pge.opuc.filings@pgn.com

Sincerely,

/s/ Jaki Ferchland
Jaki Ferchland
Manager, Revenue Requirement

JF/np Enclosures. As an introduction and summary of the Compliance Report, answer the following questions:

Why is PGE submitting a Compliance Report? What information was used as the basis of this Compliance Report?

PGE is submitting this Compliance Report to fulfill the requirements of ORS 469A.170. The report is based on actual renewable energy certificates (REC)-related activity, information from PGE's 2019 Integrated Resource Plan (IRP), and PGE's 2018 Renewable Portfolio Standard (RPS) Revised Renewable Portfolio Implementation Plan (RPIP), UM 1916, filed December 29, 2017.

Did the company meet its RPS target, and if not, describe in detail why not?

Yes, PGE has met its 2019 RPS target. The compliance details are provided in this report.

Provide the following information in response to the requirements of OAR 860-083-0350:

OAR 860-083-0350(2)(a)

The total number of megawatt-hours sold to retail electricity consumers covered by ORS 469A.052 by the electric company or sold in the service areas of each electric company covered by ORS 469A.052 by the electricity service supplier.

Response:

For 2019, the total number of megawatt-hours sold to retail electricity consumers was:

PGE's Total Billed Load: 17,375,920 megawatt-hours

Source: 2019 PGE FERC Form 1 (Page 304, Row 41, Column (b)).

OAR 860-083-0350(2)(b)

The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired in the compliance year and used to meet the renewable portfolio standard.

Response:

There were 521,278 unbundled RECs and 0 bundled RECs acquired for the compliance year 2019 (January 1, 2019 - December 31, 2019) that were used to meet the 2019 RPS requirement. See Attachment E for additional support.

OAR 860-083-0350(2)(c)

The total number of renewable energy certificates, identified as either unbundled or bundled certificates, acquired on or before March 31 of the year following the compliance year and used to meet the renewable portfolio standard.

Response:

There were no bundled RECs acquired between January 1, 2020 and March 31, 2020 that will be used to meet the RPS requirement for compliance year 2019.

There were no unbundled certificates acquired and/or issued between January 1, 2020 and March 31, 2020 that will be used to meet the RPS requirement for compliance year 2019.

See Attachment E for additional support.

OAR 860-083-0350(2)(d)

The total number and cost of unbundled renewable energy certificates, identified as either banked or non-banked certificates, used to meet the renewable portfolio standard.

Response:

Confidential Attachment A provides the total number and cost by facility of the unbundled RECs used to meet the RPS. PGE is using the maximum allowable unbundled RECs, which is 20% of PGE's total obligation.

OAR 860-083-0350(2)(e)

The total number of banked bundled renewable energy certificates that were used to meet the renewable portfolio standard.

Response:

The total number of banked bundled RECs that will be used to meet the RPS for compliance year 2019 is 874,730.

See Attachment F for additional support.

OAR 860-083-0350(2)(f)

The total number of renewable energy certificates, identified as either bundled or unbundled certificates, issued in the compliance year that were banked to serve Oregon electricity consumers.

Response:

There were 0 unbundled RECs that were issued in the compliance year that were banked to serve Oregon electricity consumers.

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As of this filing, there are 2,064,197¹ bundled RECs issued for the compliance year 2019 that will be banked to serve Oregon electricity consumers.

See the 2019 column in Attachment B for detail by facility of total RECs generated.

OAR 860-083-0350(2)(g)

For electric companies, unless otherwise provided under subsection (2)(k) of this rule, the total number of renewable energy certificates included in the rates of Oregon retail electricity consumers that were sold since the last compliance report, including:

- (A) The names of the associated generating facilities; and
- (B) For each facility, the year or years the renewable energy certificates were issued.

Response:

The table below shows the total number by facility and year issued of RECs included in the rates of Oregon retail electricity consumers that were sold since PGE's last compliance report:

Facility	Year	Total
Biglow Canyon Wind Farm - Biglow Canyon 3	2019	317,660
Biglow Canyon Wind Farm - Biglow Phase 2	2019	365,974
Tucannon River Wind Farm - Tucannon River 1	2019	349,059
Tucannon River Wind Farm - Tucannon River 2	2019	338,283
Grand Total		1,370,976

OAR 860-083-0350(2)(h)

Unless otherwise provided under subsection (2)(k) of this rule, for each generating facility associated with the renewable energy certificates included in subsections (2)(b), (c), (f), or (g) of this rule the following information:

- (A) The name of the facility;
- (B) The county and state where the facility is located;
- (C) The type of renewable resource;
- (D) The total nameplate megawatt capacity of the facility;
- (E) For an electric company, the Oregon share of the nameplate megawatt capacity of the facility;
- (F) The year of the first delivery of qualifying electricity or the first year of the contract for the purchase of unbundled renewable energy certificates; and
- (G) The duration of the contract or the amortization period of a facility owned by the electric company or the planned lifetime of a facility owned by the electricity service supplier.

Response:

See Attachment C.

¹ Total RECs generated in 2019 (See Attachment B − 2,078,202), less 2:1 RECs (See Attachment B − 14,005), plus purchased bundled RECs issued in 2019 (0).

OAR 860-083-0350(2)(i)

The amount of alternative compliance payments the electric company or electricity service supplier elected to use or was required to use to comply with the applicable renewable portfolio standard.

Response:

There were no alternative compliance payments that PGE elected to use or was required to use to comply with the applicable renewable portfolio standard.

OAR 860-083-0350(2)(j)

For an electric company, sufficient data, documentation, and other information to demonstrate that any voluntary alternative compliance payments were a reasonable compliance method.

Response:

PGE has not made any voluntary alternative compliance payments for 2019.

OAR 860-083-0350(2)(k)

Documentation of use of renewable energy certificates from the system under OAR 330-160-0020 established for compliance with the applicable renewable portfolio standard.

Response:

The attached WREGIS report (Attachment D) shows all RECs to be used to meet the 2019 RPS. The RECs are currently in an active sub-account named "2019 Compliance RPS." Within 30 days of the approval of PGE's RPS Compliance Report by the Public Utility Commission of Oregon (Commission), the RECs will be retired to a retirement sub-account named "OR RPS 2019." To validate compliance, PGE will then send a retirement report from WREGIS to the Commission.

OAR 860-083-0350(2)(1)

For each electric company, a detailed explanation of any material deviations from the applicable implementation plan filed under OAR 860-083-0400, as acknowledged by the Commission.

Response:

The table below presents a comparison between the 2019 REC requirements as forecasted in UM 1916 (PGE's 2018 RPIP) and the proposed 2019 REC retirements for 2019 RPS Compliance (Attachment D).

Material changes arose due to:

• Lower compliance obligation due to slightly lower than forecast loads; a decrease of 417 RECs.

- REC purchases: In 2019, unbundled RECs were found to be available at reasonable prices.
 Accordingly, PGE purchased and retired unbundled RECs equal to 20% of the 2019 RPS obligation.
- Wind RECs: The distribution of actual retired RECs across the wind projects differ from the 2018 Revised RPIP due to differences between the forecasted and actual REC bank positions by REC type and vintage prior to retirement and the use of unbundled RECs for compliance. PGE retired RECs in the following priority: retirement of 5-year RECs over infinite-life RECs and older 5-year RECs over newer 5-year RECs. The distribution of REC retirements by resource is highly dependent on the REC type and vintage within each resource. These differences, combined with purchased RECs, increased the retired RECs from Biglow Canyon Phase 1 and decreased the number of RECs retired from Biglow Canyon Phases 2 and 3, Tucannon River, Klondike II, and Vansycle.

Resource	2019 Projection from 2018 RPIP ² , ³	Actual RECs in 2019 Compliance Plan	Deviation from Forecast
Unbundled RECs	-	521,278	521,278
Biglow Canyon Phase 1	82,911	1,077,548	994,637
Biglow Canyon Phase 2	445,109	10,905	(434,204)
Biglow Canyon Phase 3	198,505	7,958	(190,547)
Tucannon River Total	892,764	37,774	(854,990)
Klondike II	217,434	180,718	(36,716)
Vansycle Wind Project	71,163	56,875	(14,288)
Pelton/Sullivan/Round Butte Low-Impact Hydro	438,000	438,000	-
Hydro Upgrades	100,785	146,857	46,072
Bellevue/Yamhill Solar	6,379	2,679	(3,700)
Outback Solar	-	8,276	8,276
ETO and Other Solar	50,550	19,456	(31,094)
Biogas	5,143	-	(5,143)
Purchased Bundled	84,059	84,059	0
Total	2,592,800	2,592,383	(417)

See Attachment F for additional support.

OAR 860-083-0350(2)(m)

As specified in OAR 860-083-0100, the total number and cost of bundled renewable energy certificates used for compliance.

² The RPS Compliance report adds forecasted SPO Solar RECs into ETO and Other Solar

³ While the RPIP includes Outback Solar with ETO and Other Solar, the 2018 RPIP (UM 1916) forecasted no Outback Solar RECs to be retired in 2019

Response:

Incremental Cost of Compliance Bundled RECs		
Resource	No. Of RECs	Total Cost
Biglow Canyon Phase 1	1,077,548	\$ 42,164,453.24
Biglow Canyon Phase 2	10,905	\$ 334,892.55
Biglow Canyon Phase 3	7,958	\$ 528,888.68
Tucannon River	37,774	\$ 778,899.88
Purchased Bundled	84,059	\$ 300,069.03
Total	1,218,244	\$ 44,107,203.38

^{*} Per OAR 860-083-0100(1)(i), incremental costs are deemed to be zero for qualifying electricity from generating facilities or contracts that became operational before June 6, 2007 and for certified low-impact hydroelectric facilities. Therefore, only the RECs from Biglow, Tucannon, and purchased bundled RECs are included in this response. Part 13(a) states if new qualifying electricity in a compliance year totals less than 20 MW, the incremental cost is not required to be included in compliance reports.

OAR 860-083-0350(2)(n)

For each electric company, its projected annual revenue requirement as calculated in OAR 860-083-0200 and its total cost of compliance.

Response:

PGE's annual revenue requirement for 2019 is: \$1,831,380,634⁴

PGE's total cost of compliance for 2019 is:

$$[2(d) + 2(m)] = $221,743 + $44,107,203 = $44,328,947$$

Cost of compliance as percentage of revenue requirement is:

See Attachment F for additional support.

⁴ Source: PGE's final revenue requirement as authorized by Commission Order No. 18-464, Docket No. UE 335 (2019 general rate case).

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OAR 860-083-0350(2)(o)

For each electricity service supplier, its total cost of compliance, its average cost of compliance, and its cost limit as specified in OAR 860-083-0300(2), including all calculations.

Response:

Not applicable.

OAR 860-083-0350(2)(p)

For each electric company, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in ORS 469A.100(1) is reached for the compliance year.

Response:

PGE did not reach the 2019 Compliance Cost limit specified in ORS 469A.100(1).

OAR 860-083-0350(2)(q)

For each electricity service supplier, an accounting of the use of the renewable energy certificates and alternative cost payments consistent with OAR 860-083-0300(3) if the cost limit in OAR 860-083-0300(2) is reached for the compliance year.

Response:

Not applicable.

OAR 860-083-0350(2)(r)

As specified in OAR 860-083-0100, the number and total cost of all bundled renewable energy certificates issued.

Response:

See Attachment B.

OAR 860-083-0350(2)(s)

As specified in OAR 860-083-0100, the number and total cost of bundled renewable energy certificates issued that are associated with new qualifying electricity since the last compliance report.

Response:

See Footnote 5 on Attachment B.

OAR 860-083-0350(6)

Each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must post on its web site the public portion of the four most recent annual compliance reports required under this rule and provide a copy of the most recent such report to any person upon request. The public portions of the most recent compliance report must be posted within 30 days of the Commission decision in section (5) of this rule. The posting must include any Commission determinations under section (5) of this rule.

Response:

PGE will post its compliance report in accordance with the requirement, within 30-days of the Commission decision.

OAR 860-083-0350(7)

Consistent with Commission orders for disclosure under OAR 860-038-0300, each electric company subject to ORS 469A.052 and each electricity service supplier subject to ORS 469A.065 must provide information about its compliance report to its customers by bill insert or other Commission-approved method. The information must be provided within 90 days of the Commission decision in section (5) of this rule or coordinated with the next available insert required under OAR 860-038-0300. The information must include the URL address for the compliance reports posted under section (6) of this rule.

Response:

PGE will provide information about its compliance report to its customers in accordance with this requirement, within 90-days of the Commission decision or coordinated within the next available bill insert as required under OAR 860-038-0300.

2019 Renewable Portfolio Standard Compliance Report UM XXXX

Attachment A

Total number and cost of unbundled RECs, banked and/or non-banked certificate

OAR 860-083-0350(2)(d)

[Word Format and provided under separate cover]

Protected Information Subject to

General Protective Order xx-xxx

2019 Renewable Portfolio Standard Compliance Report UM XXXX

Attachment B

REC Retirements

OAR 860-083-0350(2)(f)(r)(s)

[Excel Format to <u>puc.workpapers@state.or.us</u>]

2019 Renewable Portfolio Standard Compliance Report UM XXXX

Attachment C

Generating Facilities

OAR 860-083-0350(2)(h)

[Excel Format to <u>puc.workpapers@state.or.us</u>]

2019 Renewable Portfolio Standard Compliance Report UM XXXX

Attachment D

RECs Compliance

OAR 860-083-0350(2)(k)

[Excel Format to <u>puc.workpapers@state.or.us</u>]

2019 Renewable Portfolio Standard Compliance Report UM XXXX

Attachment E

Megawatt-hours sold, RECs acquired to meet RPS

OAR 860-083-0350(2)(a)(b)(c)(d)

[Excel Format to puc.workpapers@state.or.us]

2019 Renewable Portfolio Standard Compliance Report UM XXXX

Attachment F

Banked RECs, REC compliance deviations, revenue requirement and total cost of compliance calculations

OAR 860-083-0350(2)(e)(f)(k)(l)(m)(n)

[Excel Format to puc.workpapers@state.or.us]

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM XXXX

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY's,

2019 Renewable Portfolio Standard Compliance Report.

PGE'S MOTION FOR GENERAL PROTECTIVE ORDER

EXPEDITED CONSIDERATION REQUESTED

Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Portland General Electric Company ("PGE") requests the issuance of a General Protective Order in this proceeding. PGE believes good cause exists for the issuance of such an order to protect confidential business information, plans, and strategies. In support of this Motion, PGE states:

- 1. The Commission's rules authorize PGE to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See ORCP 36(C)(7) (providing protection against unrestricted discovery of trade secrets or other confidential research, development or commercial information).
- 2. Along with this motion, PGE has filed its 2019 Renewable Portfolio Standard ("RPS") Compliance Report with the Public Utility Commission of Oregon. The filing contains confidential information, including commercially sensitive pricing information.
- 3. PGE anticipates that parties participating in this docket will seek to discover the above-mentioned, as well as additional, confidential commercial information, which is potentially relevant to this docket. However, the public disclosure of this confidential and commercially sensitive information could be detrimental to PGE and its customers.

- 4. The Commission should, therefore, issue a Protective Order to protect the confidentiality of these materials and help facilitate PGE's production of relevant information during the discovery process.
- 5. The requested order, identical to the one that the Commission customarily issues, is attached.

DATED this 30th day of July, 2020.

Respectfully submitted,

/s/J. Richard George

J. Richard George, OSB No. 974691 Associate General Counsel Portland General Electric Company 121 SW Salmon Street, 1WTC1301 Portland, Oregon 97204 (503) 464-7611 (Telephone) (503) 464-2200 (Facsimile) richard.george@pgn.com

ENTERED

BEFORE THE PUBLIC UTILITY

COMMISSION OF OREGON

1	UM
In the Matter of	
PORTLAND GENERAL ELECTRIC COMPANY's,	GENERAL PROTECTIVE
2019 Renewable Portfolio Standard Compl Report.	liance ORDER

DISPOSITION: MOTION FOR PROTECTIVE ORDER GRANTED

On July 30, 2020 Portland General Electric Company ("PGE") filed a motion for a general protective order with the Public Utility Commission of Oregon ("Commission") to govern the acquisition and use of protected information produced or used in these proceedings.

PGE also filed its 2019 Renewable Portfolio Standard ("RPS") Compliance Report on July 30, 2020. The RPS Compliance Report will include confidential and commercially sensitive pricing information. PGE anticipates that there may be requests for further confidential information in this docket. PGE states that good cause exists for the issuance of a protective order to protect confidential business information, plans and strategies. PGE adds that the public release of such information could prejudice PGE and its customers.

I find that good cause exists to issue a general protective order, which is attached as Appendix A. A party may appeal this order to the Commission under OAR 860-001-0110.

ORDER

attached as Appendix A, is
[Judge] nistrative Law Judge

GENERAL PROTECTIVE ORDER DOCKET NO.

Scope of this Order:

1. This order governs the acquisition and use of Protected Information produced or used by any party to these proceedings.

Designation of Protected Information:

- 2. Any party may designate as Protected Information any information the party reasonably determines:
 - (a) Falls within the scope of ORCP 36(C)(7) (a trade secret or other confidential research, development, or commercial information); and
 - (b) Is not publicly available.
- 3. To designate information as Protected Information, a party must place the following legend on the material:

PROTECTED INFORMATION SUBJECT TO GENERAL PROTECTIVE ORDER

The party should make reasonable efforts to designate as Protected Information only the portions of the information covered by ORCP 36(C)(7).

4. Each page of a document containing Protected Information filed with the Commission or provided to Qualified Persons under this order must be printed on yellow paper and placed in a sealed envelope or other appropriate container. *Only the portions of a document that fall within ORCP 36(C)(7) may be placed in the envelope/container.* The envelope/container must bear the legend:

THIS ENVELOPE IS SEALED UNDER ORDER NO. _____AND CONTAINS PROTECTED INFORMATION. THE INFORMATION MAY BE SHOWN ONLY TO QUALIFIED PERSONS AS DEFINED IN THE ORDER.

- 5. A party may designate as Protected Information any information previously provided by giving written notice to the Commission and other parties. Parties in possession of newly designated Protected Information must make reasonable efforts to ensure that all copies of the material containing the information bear the above legend if requested by the designating party.
- 6. A designating party must make reasonable efforts to ensure that information designated as Protected 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)(7), 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 Protected:

- 7. A party may informally challenge any designation of Protected 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)(7). Any party may request that the ALJ hold a conference to help resolve disputes about proper designation.
- 8. 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.
- 9. 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.
- 10. 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 Protected Information:

- 11. Only Qualified Persons may access Protected Information designated by another party under this Protective Order. Persons automatically bound by this protective order and qualified to access Protected Information are:
 - a. Commission employees; and
 - b. Assistant Attorneys General assigned to represent the Commission.
- 12. Persons qualified upon a party signing the Consent to be Bound section of Appendix B are:
 - a. Counsel for the party;
 - b. Any person employed directly by counsel of record; and
 - c. An employee of the Regulatory Division at the Citizens' Utility Board of Oregon.

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

13. A party bound by the protective order may seek to qualify other persons to access Protected Information by having those persons complete and sign Appendix C, and submitting that information to the Commission and all parties. Within five business days of receiving a copy of Appendix C, the designating party must either provide the requested access to Protected Information or file an objection under Paragraph 14.

Objection to Access to Protected Information:

- 14. All Qualified Persons have access to Protected 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, the designating party must provide the Qualified 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.
- 15. 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 Protected Information may not be disclosed to the person subject to the objection.

Use of Protected Information:

- 16. All Qualified Persons must take reasonable precautions to keep Protected Information secure. A Qualified Person may reproduce Protected Information to the extent necessary to participate in these proceedings. A Qualified Person may discuss Protected Information obtained under this order only with other Qualified Persons who have obtained the same information.
- 17. Without the written permission of the designating party, any Qualified Person given access to Protected Information under this order may not disclose Protected Information for any purpose other than participating in these proceedings.
- 18. 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.
- 19. Counsel of record may retain memoranda, pleadings, testimony, discovery, or other documents containing Protected 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. The information retained may only be disclosed to

Qualified Persons under this order. Any other person retaining Protected 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 Protected Information. This paragraph does not apply to the Commission or its Staff.

Duration of Protection:

20. The Commission will preserve the designation of information as protected 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 Protected Information.

CONSENT TO BE BOUND DOCKET NO.

I. Consent to be Bound:

This general protective order governs the use of Protected Info proceedings.	ormation in these
Party agrees to be bound	
general protective order and certifies that it has an interest in that adequately represented by other parties to the proceedings.	ese proceedings that is not
Signature:	
Printed Name:	
Date:	
II. Persons Qualified under Paragraph 12:	
(Party) identifies the follow under paragraph 12.	ving person(s) qualified
PRINTED NAME	DATE
	_

QUALIFICATION OF OTHER PERSONS DOCKET NO.

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.

Signature:	Date:
Printed Name:	
Physical Address:	
Email Address:	
Employer:	
Associated Party:	
Job Title:	
If not employee of party, description of practice and clients:	