Portland General Electric Company
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204
portlandgeneral.com

March 9, 2021

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

Re: AR 641 –PGE Comments for Workshop on March 12, 2021

Portland General Electric Company (PGE) respectfully submits these comments in support of the Rulemaking to review and amend Division 001 procedural rules. PGE participated in the workshop on February 12, 2021 where the common theme was around the following administrative rules outlined below:

- Confidential Information 860-001-0070 (Platform)
- Discovery in Contested Case Proceedings 860-001-0500 (no comments)
- Data Requests 860-001-0540 (Platform)
- General Rate Revision 860-022-0019 (Because of reference to standard data requests only) (no comments)
- Filing Requirements in Contested Case and Declaratory Ruling Proceedings 860-001-0170 (consideration of confidential information filings only) (Platform)

PGE responds as follows: Due to business practice changes associated with the OPUC and Stakeholder responses to the COVID-19 pandemic, the OPUC has temporarily changed how confidential information is filed with the Commission. Temporarily suspending the required yellow copies and electronic formatted devices being sent via mail has made the “electronic world” more efficient. However, the need to submit a separate email with a password for the password protected confidential information and notification by email to the service list has posed additional challenges as to who is eligible to receive the confidential information.

In addition to the challenges of the OPUC Filing Center, submitting filings with attachments that must be less than 20 megabytes in size and Filings larger than 20 megabytes must be divided into multiple electronic mail messages and the need to send files with a .zip extension instead. This technology is part of Microsoft 2000 and is no longer supported by PGE as it is outdated.

The OPUC currently has a designated shared workspace / platform known as Huddle. PGE would like to see the OPUC expand the Huddle platform beyond data requests and responses for sharing of confidential information. Also, since Huddle does not have an attachment size limit, it seems that utilities would be able to upload attachments without file size limitations which would stream line the filing process without having to submit "E-mail x of y," where x equals the message number and y equals the total number of messages.

PGE appreciates the Administrative Hearings Division time working with Stakeholders to update the Division 001 Rules. PGE looks forward to the second workshop on March 12, 2021.

Sincerely,

\s\ *Robert Macfarlane*

Robert Macfarlane
Manager, Pricing & Tariffs