

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 67

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER's)	RENEWABLE ENERGY COALITION'S
)	RESPONSE TO SIERRA CLUB'S
2017 Integrated Resource Plan.)	MOTION TO SUPPLEMENT THE
)	RECORD WITH LETTER
)	REQUESTING PACIFICORP
)	TRANSPARENCY
_____)	

I. INTRODUCTION

The Renewable Energy Coalition (the "Coalition") submits this response in support of Sierra Club's Motion to Supplement the Record with Letter Requesting PacifiCorp Transparency. PacifiCorp's Sur-Reply to Sierra Club's Written Objection to PacifiCorp's Confidential Designations addresses PacifiCorp's claims that its stakeholders do not support Sierra Club's objection to the Company's designations of protected information in the coal analysis. The Coalition submits this response to make it clear that the Coalition supports Sierra Club's efforts to ensure that the public and those stakeholders who have not signed the protective order have a right to know whether PacifiCorp is providing its customers with the least-risk, least-cost resource mix available, including the economics of coal-fired generation.

II. COMMENTS

The Coalition's members include over thirty entities that own and operate approximately fifty renewable energy generation facilities in Oregon, Idaho, Montana, Washington, Utah, and Wyoming. The Coalition's members including irrigation districts, water districts, corporations, cooperatives, and individuals, and the majority are

small hydroelectric projects less than 7 megawatts, but also include biomass, solar, geothermal, and waste energy. The Coalition participates in PacifiCorp and other Northwest investor owned utility integrated resource plans because they often form the foundation for PacifiCorp's resource acquisition strategy, which directly impacts PacifiCorp's avoided cost rates paid to renewable energy generators selling under the Public Utility Regulatory Policies Act.

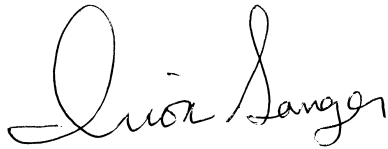
The Coalition's members as well as its Executive Director (John Lowe) and primary integrated resource plan consultant (Nancy Esteb) generally do not sign protective orders or review confidential information. Limitations on access to information and over-designation of confidential information significantly hamper its ability to understand and participate in integrated resource planning proceedings. The Coalition has in the past challenged some utility confidentiality designations. However, the Coalition generally does not challenge PacifiCorp's confidentiality claims because it is expensive, difficult and often pointless as the Commission has historically been very deferential to PacifiCorp's efforts to keep its material out of the public view. In other words, the Commission should not construe the Coalition or any other party's silence as agreement with PacifiCorp's treatment of confidential material.

III. CONCLUSION

The Coalition operates and has members in five of PacifiCorp's six states. The Coalition supports Sierra Club's objection to the Company's designations of protected information in the coal analysis and supports Sierra Club's motion to supplement the record to establish that other stakeholders in any of PacifiCorp's six states supports Sierra Club's challenge.

Dated this 6th day of August, 2018.

Respectfully submitted,

A handwritten signature in black ink that reads "Irion Sanger". The signature is written in a cursive style with a large initial "I" and a long, sweeping underline.

Irion Sanger
Sanger Law, PC
1117 SE 53rd Avenue
Portland, OR 97215
Telephone: 503-756-7533
irion@sanger-law.com

Of Attorneys for the Renewable
Energy Coalition