

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 416**

4 In the Matter of
5 PORTLAND GENERAL ELECTRIC
6 COMPANY,
7 Request for a General Rate Revision.

**STAFF RESPONSE TO REQUEST FOR A
MODIFIED PROTECTIVE ORDER**

8 Staff of the Public Utility Commission of Oregon (Staff) submits this response to
9 Portland General Electric Company’s (PGE’s) Motion for a Modified Protective Order (MPO) to
10 protect material designated as “Highly Confidential.” Staff does not object to imposition of
11 heightened protections for Highly Confidential information but does have concern with one
12 aspect of the protection requested by PGE for “highly sensitive infrastructure information.”
13 Under the proposed MPO Qualifying Persons would only be able to review highly sensitive
14 infrastructure information “through physical inspection at a place identified by PGE,” meaning,
15 the Qualifying Person seeking the information would only be able to review the information by
16 going to PGE in person.¹

17 Limiting access to highly sensitive infrastructure information to those who can travel to
18 PGE for physical inspections is overly burdensome for Staff because Staff has assigned issues
19 related to cyber and physical security to outside consultants that are not located in Oregon. To
20 address this potential burden, Staff and PGE have agreed to a proposed modification to the draft
21 MPO to allow PGE and the Qualified Person asking for the material to agree to an alternate
22 method of inspection for highly sensitive infrastructure information.” Under the proposed
23 modification, PGE would retain the ability to limit review to physical inspection if a mutually
24 agreeable alternative discovery option is not found.

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¹ Portland General Electric Company Motion for Modified Protective Order, Appendix A, par. 4.

