



June 13, 2018

**Via Electronic Filing**

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, Oregon 97301-3398

**RE: LC 67 - PacifiCorp's 2018 Coal Plant Economic Analysis**

Dear Commissioners,

Sierra Club writes regarding PacifiCorp's release of its upcoming June 30, 2018, coal plant economic analysis, as required by your final order in LC 67 (action items 5a -5h). We understand that the company intends to present the results of the economic analysis at its next 2019 IRP stakeholder meeting on June 28-29. We further understand that only those stakeholders who sign a nondisclosure agreement with PacifiCorp will be allowed to participate in the coal plant analysis discussion. Sierra Club finds this troubling and inconsistent with the whole point of a publicly-available, unit by unit economic analysis of the company's coal fleet as described in your final LC 67 order.

The grounds on which PacifiCorp would base confidentiality of the study results are unclear. Stakeholders have been requesting such an analysis for years so that the Commission and customers could be finally and fully informed of whether continued expenditures and reliance on aging coal plants is in the best interest of ratepayers. Shielding the study's results from customers, the Commission, and the public at large defeats the value of the exercise.

Under the LC 67 protective order, the company may only designate trade secrets and other sensitive business information as confidential. We worry the company may not adhere to those strict standards under a private nondisclosure agreement; rather it may attempt to hide from the public information shareholders might find distasteful, e.g., information that simply reflects poor decision-making. The Commission already determined that the disclosures supporting the coal plant analysis are in the public interest, so any attempt by PacifiCorp to hide this information would be, by definition, against the public interest. Should PacifiCorp take legally dubious steps to limit the public's access to its coal plant economic analysis, Sierra Club will formally challenge any overbroad or improper claim of confidentiality with this Commission.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Gloria Smith

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