



**Portland General Electric Company**  
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**Loretta I. Mabinton**  
Associate General Counsel

June 21, 2019

*Via Electronic Filing*

Public Utility Commission of Oregon  
Attention: Filing Center  
PO Box 1088  
Salem OR 97308-1088

**RE: LC 73, PORTLAND GENERAL ELECTRIC COMPANY, 2019 Integrated  
Resource Plan (IRP)**

Attn: Filing Center

Attached for filing in the above-referenced docket is Portland General Electric Company's Modified Objection to NIPPC's Request to Designate Henry Tilghman as a Qualified Consultant under General Protective Order No. 19-186.

Thank you for your assistance.

Sincerely,

A handwritten signature in purple ink that reads "Loretta Mabinton".

Loretta Mabinton  
Associate General Counsel

LM:bp

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
LC 73

In the Matter of

PORTLAND GENERAL  
ELECTRIC COMPANY,

2019 Integrated Resource Plan.

**PORTLAND GENERAL ELECTRIC  
COMPANY'S MODIFIED OBJECTION TO  
NORTHWEST AND INTERMOUNTAIN  
POWER PRODUCERS COALITION'S  
REQUEST TO DESIGNATE HENRY  
TILGHMAN AS A QUALIFIED  
CONSULTANT UNDER ORDER NO. 19-186**

Under Section 15 of the Public Utility Commission of Oregon (Commission), General Protective Order No. 19-186, issued in the above-captioned docket, Portland General Electric Company (PGE) modifies its objection to Northwest and Intermountain Power Producers Coalition's (NIPPC) request to designate Henry Tilghman as a qualified consultant.

On June 6, 2019, NIPPC filed signatory pages under General Protective Order No. 19-186 for its legal counsel. On June 6, 2019, NIPPC also filed a request to designate Mr. Tilghman as a qualified consultant under the General Protective Order<sup>1</sup>. PGE objects to the designation of Mr. Tilghman as a qualified consultant under the General Protective Order because Mr. Tilghman and his consulting company, Tilghman Associates, represent independent power producers. Those types of entities are competitors that may be involved in future negotiations with PGE. Accordingly, disclosure of the protected sensitive information would put PGE and its customers at a significant commercial disadvantage.

Some of the information that PGE will disclose in the IRP is extremely commercially sensitive information that will give Mr. Tilghman's clients, potential competitors of PGE, an unfair advantage over PGE and its customers. For example, historically, PGE discloses hourly price forecast data in the IRP. Not only would such data flow into the scoring in PGE's RFP, it is also data that, on a bilateral basis, puts PGE and its customers at a competitive disadvantage in resource procurement.

PGE and NIPPC have discussed and agree to the following modifications to PGE's objection to Mr. Tilghman's signing of the Protective Order:

1. PGE withdraws its objection to Mr. Tilghman signing the Protective Order.

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<sup>1</sup> Attached as Attachment A.

2. Mr. Tilghman will not seek, and Staff will not grant Mr. Tilghman access to the Commission's Huddle site. Mr. Tilghman will not access the Huddle site for purposes of this docket.
3. NIPPC counsel will provide Mr. Tilghman non-confidential documents in this docket.
4. PGE will provide Mr. Tilghman access to confidential information under Order No. 19-186, subject to PGE's right to object to Mr. Tilghman seeing specific documents and imposing special handling conditions for documents, for example, giving Mr. Tilghman access to review specific documents only at PGE's offices.

### CONCLUSION

Given the resolution of this dispute as stated above, PGE respectfully requests that the Commission enter an order approving the terms of Mr. Tilghman's access to documents under Order No. 19-186 as set out above.

DATED this 21 day of June, 2019.

Respectfully submitted,



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Erin Apperson, OSB No. 175771  
Loretta Mabinton, OSB No. 020710  
General Electric Company  
121 SW Salmon Street, WTC1301  
Portland, Oregon 97204  
(503) 464-8544 (phone)  
(503) 464-2200 (fax)

**QUALIFICATION OF OTHER PERSONS**

LC 73

**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.

|   |  |                     |
|---|--|---------------------|
| <b>Signature:</b>   |   | <b>Date:</b> 6/5/19 |
| <b>Printed Name:</b>  | Henry Tilghman   |                     |
| <b>Physical Address:</b>  | 1816 NE 53rd Ave; Portland, OR; 97213  |                     |
| <b>Email Address:</b>   | hrt@tilghmanassociates.com   |                     |
| <b>Employer:</b>  | Tilghman Associates  |                     |
| <b>Associated Party:</b>  | NIPPC  |                     |
| <b>Job Title:</b>   | Principal Consultant   |                     |
| <b>If not employee of party, description of practice and clients:</b> | <p>In my practice, I provide management and policy consulting on issues related to the energy industry. Topical areas include transmission service and interconnection; transmission planning; transmission rates; resource adequacy; market design; gas-electric interface; and integration of renewable energy.</p> <p>Clients include NIPPC, National Grid, and EDP Renewables.</p> |                     |