



Portland General Electric Company

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Erin E. Apperson

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March 7, 2023

Via Electronic Filing

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

Re: LC 80 – Portland General Electric Company’s 2023 Integrated Resource Plan (IRP) /
Clean Energy Plan (CEP)

Dear Filing Center:

Portland General Electric Company (PGE) will be filing its 2023 Integrated Resource Plan (IRP) and Clean Energy Plan (CEP) on March 31, 2023.

PGE requests that the Commission open a docket for PGE’s IRP/CEP and grant the enclosed Motion for a General Protective Order to allow for protection of confidential information. PGE also requests the Commission schedule a prehearing conference on or before March 21, 2023, if possible.

This letter and the motion are being filed by electronic mail with the Filing Center.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Apperson", with a long, sweeping horizontal line extending to the right.

Erin E. Apperson
Assistant General Counsel III

EEA: bp

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 80

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

2023 Integrated Resource Plan/Clean Energy
Plan.

MOTION FOR A GENERAL
PROTECTIVE ORDER

Pursuant to ORCP 36(C)(1) and OAR 860-001-0080(1) and (2), Portland General Electric Company (PGE) moves the Public Utility Commission of Oregon (Commission) for entry of a General Protective Order in this proceeding. PGE believes good cause exists for the issuance of such an order to protect commercially sensitive and confidential business information, plans, and strategies produced in this docket.

In support of this Motion, PGE states:

1. The Commission’s rules authorize Portland General Electric Company to seek reasonable restrictions on discovery of trade secrets and other confidential business information. *See* OAR 860-001-0080(1); *see also* ORCP 36(C)(1) (providing protection against unrestricted discovery of “...trade secrets or other confidential research, development or commercial information...”).

2. Concurrent with this Motion, PGE has requested that the Commission open a docket for its 2023 Integrated Resource Plan (IRP) and Clean Energy Plan (CEP) that PGE intends to file on March 31, 2023. PGE anticipates that stakeholders and other parties to this docket will make discovery requests that may include confidential material, including but not limited to proprietary cost data and models, information covered by confidentiality agreements, commercially sensitive

load and resource projections and other confidential analyses. The disclosure of confidential business information and/or trade secrets.

3. While PGE desires the flexibility to provide confidential information in this proceeding, the public disclosure of sensitive and confidential information would be detrimental to PGE and its customers.

4. The Commission should, therefore, issue a protective order to protect commercially sensitive and confidential business information.

For the reasons stated above, PGE requests that the Commission enter its General Protective Order in this proceeding.

DATED this 7th day of March, 2023.

Respectfully submitted,



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