

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

DOCKET NO. UM 1191

QWEST CORPORATION,)	
)	
Complainant,)	RESPONDENT CEC'S
)	RESPONSE TO QWEST'S
vs.)	MOTION FOR PROTECTIVE
)	ORDER
)	
CENTRAL ELECTRIC COOPERATIVE,)	
INC.,)	
)	
Defendant.)	
_____)	

Complainant Qwest Corporation has filed a motion for entry of “Standard Protective Order” without explaining what it is referring to by a “Standard Protective Order”.

In the body of Qwest’s Motion, they use the term “Standard Protective Order” and “Protective Order” interchangeably. While Qwest outlines some aspects of the Protective Order they are requesting, they did not file with their motion a copy of what they are referring to as a “Standard” Protective Order.

Defendant CEC may be willing to enter into a Protective Order, but it cannot do so in a vacuum. Few Courts, including administrative bodies have “standard” orders to protect the flow of information. Each of these orders is often tailored to the specific parties involved and issues to be resolved.

Until Complainant Qwest Corporation specifies precisely the language they are requesting in a protective order, CEC will object to a request for an non-described Order that may overly restrict information or fail to protect parties adequately.

DATED this 4th day of May, 2005.

FRANCIS HANSEN & MARTIN, LLP

Martin E. Hansen, OSB #80052
Of Attorneys for Plaintiff

CERTIFICATE OF TRUE COPY

I hereby certify that the foregoing **DEFENDANT CEC'S RESPONSE TO QWEST'S MOTION FOR PROTECTIVE ORDER** is a true, exact and full copy of the original thereof.

DATED: May 4, 2005

Martin E. Hansen, OSB #80052
Of Attorneys for Defendant
Central Electric Cooperative, Inc.

CERTIFICATE OF MAILING

I certify that I served the foregoing document(s) by depositing a true, full and exact copy thereof in the United States Post Office at Bend, Oregon, on May 4, 2005, enclosed in a sealed envelope with postage thereon, addressed to:

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