

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

DOCKET NO. UM 1191

QWEST CORPORATION

Complainant,

v.

CENTRAL ELECTRIC COOPERATIVE, INC.,

Defendant.

QWEST'S MOTION FOR ENTRY OF
STANDARD PROTECTIVE ORDER

Pursuant to OAR 860-012-0035(1)(k), Complainant, Qwest, hereby requests that the Commission enter its standard protective order in this docket in order to limit the disclosure of confidential information.

Good cause exists for the issuance of a protective order. This proceeding involves issues that may require both parties to disclose sensitive, proprietary, and confidential information. Among other things, the parties anticipate that it may become necessary to disclose information relating to the parties' negotiations regarding their joint use contract and the parties' operations, finances, and relationships with other pole owners and occupants. Such information may be confidential and proprietary. The unprotected disclosure of this information could disadvantage the parties in their commercial dealings with entities that are not party to these proceedings, resulting in monetary loss to the parties and, ultimately, to their customers. Qwest has taken stringent measures to safeguard the confidentiality of the information that may need to be

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disclosed in this matter.

WHEREFORE, Qwest requests that the Commission enter its standard protective order in this matter.

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By: 

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Of Attorneys for Complainant Qwest Corporation

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[13141-0273-000000/PA051170.058]

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CERTIFICATE OF SERVICE

I hereby certify that on April ~~15~~²⁷, 2005 I served the foregoing **Motion for Protective Order** on the following person by causing to be emailed and mailed a full, true and correct copy thereof contained in a sealed envelope with postage prepaid addressed to said to person at the following addresses and deposited in the post office at Portland, Oregon:

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DATED: April 27, 2005.

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