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April 7, 2005

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**VIA ELECTRONIC FILING**

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: PacifiCorp's Motion for Standard Protective Order  
Docket UE 171**

Enclosed for filing is PacifiCorp's Motion for Standard Protective Order in the above-referenced docket. A hard copy was served on all parties to this proceeding as indicated on the attached service list.

Very truly yours,

A handwritten signature in black ink, appearing to be "Katherine A. McDowell", written over a horizontal line.

Katherine A. McDowell

KAM:knp  
Enclosure  
cc: Service List

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 171

In the Matter of PACIFIC POWER &  
LIGHT (d/b/a PacifiCorp) Klamath Basin  
Irrigation Rates

**MOTION FOR STANDARD  
PROTECTIVE ORDER  
(EXPEDITED TREATMENT  
REQUESTED)**

Pursuant to OAR 860-12-0035(1)(k), PacifiCorp moves for entry of the  
Commission's standard protective order in this proceeding. As good cause for this motion,  
PacifiCorp states:

1. In accordance with the Prehearing Conference Memorandum and Ruling in this matter (OPUC Mar. 3, 2005), PacifiCorp filed a motion for Summary Disposition on March 31, 2005.
2. KWUA and KOPWU have responded to PacifiCorp's Motion for Summary Disposition with data requests that seek documents likely to contain confidential information. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.
3. PacifiCorp is under an obligation to provide responses to the KWUA and KOPWU data requests by April 18, 2005. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process. PacifiCorp respectfully requests that the Commission grant this motion in an expedited manner so that it can provide the discovery KWUA and KOPWU have requested in a timely manner.

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1 For all the foregoing reasons, PacifiCorp requests expedited entry of the  
2 Commission's standard protective order in this docket.

3 DATED: April 7, 2005.

4 STOEL RIVES LLP

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6 Katherine A. McDowell

7 Attorneys for PacifiCorp

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing document in docket UE 171 on the  
3 following named person(s) on the date indicated below by e-mail where available, and by  
4 first-class mail, to said person(s) a true copy thereof, addressed to said person(s) at his or her  
5 last-known address(es) indicated below.

- |    |  |  |
|----|--|--|
| 6  | Edward Bartell<br>Klamath Off-Project Water Users, Inc.<br>30474 Sprague River Road<br>Sprague River, OR 97639                                     | Lisa Brown<br>Waterwatch of Oregon<br>213 SW Ash Street, Suite 208<br>Portland, OR 97204<br>lisa@waterwatch.org                  |
| 9  | John Devoe<br>Waterwatch of Oregon<br>213 SW Ash Street, Suite 208<br>Portland, OR 97204<br>john@waterwatch.org                                    | Jason Eisdorfer<br>Citizens' Utility Board of Oregon<br>610 SW Broadway, Suite 308<br>Portland, OR 97205<br>jason@oregoncub.org  |
| 12 | Edward A. Finklea<br>Cable Huston Benedict Haagensen &<br>Lloyd LLP<br>1001 SW Fifth Avenue, Suite 2000<br>Portland, OR 97204<br>efinklea@chbh.com | Dan Keppen<br>Klamath Water Users Association<br>2455 Patterson Street, Suite 3<br>Klamath Falls, OR 97603                       |
| 16 | Jim McCarthy<br>Oregon Natural Resources Council<br>PO Box 151<br>Ashland, OR 97520<br>jm@onrc.org   | Bill McNamee<br>Public Utility Commission<br>PO Box 2148<br>Salem, OR 97308-2148<br>bill.mcnamee@state.or.us                     |
| 19 | Steve Pedery<br>Oregon Natural Resources Council<br>PO Box 151<br>Ashland, OR 97520<br>sp@onrc.org   | Matthew W. Perkins<br>Davison Van Cleve PC<br>333 SW Taylor, Suite 400<br>Portland, OR 97204<br>mwp@dvclaw.com                   |
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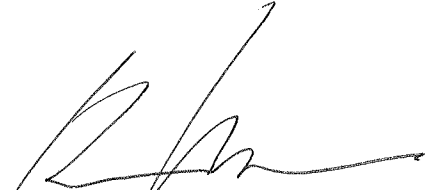
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DATED: April 7, 2005.

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