

McDowell & Rackner PC



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March 30, 2009

VIA ELECTRONIC FILING

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

Re: Docket LC 41

Enclosed for filing in the above-reference docket are an original and one copy of Idaho Power Company's Motion for Standard Protective Order.

A copy of this filing has been served on all parties to this proceeding.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo
Legal Assistant

Enclosures

cc: Service List

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

LC 41

In the Matter of Idaho Power Company's
Application to Include the Boardman to
Hemingway Transmission Line in its
Acknowledged Integrated Resource Plan
("IRP")

**MOTION FOR STANDARD
PROTECTIVE ORDER**

Pursuant to OAR 860-012-0035(1)(k), Idaho Power Company moves for entry of the Commission's standard protective order in this proceeding. As good cause for this motion, Idaho Power Company states:

1. The Commission's rules authorize Idaho Power Company to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See OAR 860-11-0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing Telecommunication Service* (UM 351), Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a party to trade secrets and other confidential commercial information" and "to facilitate the communication of information between litigants").


2. Idaho Power Company anticipates that discovery in this proceeding may include proprietary cost data and models, and commercially sensitive load and resource projections. Idaho Power Company will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

3. Issuance of a protective order will facilitate the production of relevant information, aid the discovery process and expedite resolution of this case.

1 For the foregoing reasons, Idaho Power Company requests entry of the
2 Commission's standard protective order in this docket.

3 Respectfully submitted this 30th day of March, 2009

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing document in
3 Docket LC 41 on the following named persons on the date indicated below by e-mail
4 addressed to said persons at his or her last-known address indicated below.

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DATED: March 30, 2009



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