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April 9, 2008

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission  
550 Capitol Street NE, Suite 215  
Salem, OR 97310-2551

Attn: Vikie Bailey-Goggins, Administrator  
Regulatory and Technical Support

RE: **UM 1368** - Motion for General Protective Order

Enclosed for filing by PacifiCorp d.b.a. Pacific Power is the Company's Motion for Protective Order in the above-referenced docket. A copy of this filing was served on all parties on the service list.

Informal inquiries on this matter may be directed to Joelle Steward, Regulatory Manager, at 503-813-5542.

Very truly yours,

Andrea L. Kelly  
Vice President, Regulation

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1368

IN THE MATTER OF PACIFICORP  
D/B/A PACIFIC POWER REQUEST  
FOR APPROVAL OF A 2008R-1  
SOLICITATION PROCESS FOR NEW  
RENEWABLE RESOURCES

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(7) and OAR 860-012-0035(1)(k), PacifiCorp d/b/a Pacific  
2 Power (“Company”) moves for entry of the Commission’s standard protective order in this  
3 proceeding.

4 In support of this Motion, the Company states:

5 1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions  
6 on discovery of sensitive commercial information and other confidential business  
7 information. *See* OAR 860-11-000(3) (adopting Oregon Rules of Civil Procedure  
8 (“ORCP”); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade  
9 secrets or other confidential research, development, or commercial information”). *See also*  
10 *In re Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351,  
11 Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to  
12 protect “the rights of a party to trade secrets and other confidential commercial  
13 information” and “to facilitate the communication of information between litigants”).

14 2. The Company anticipates that discovery in this proceeding may include  
15 proprietary cost data and models, commercially-sensitive load and resource projections,  
16 RFP-related information covered by confidentiality agreements, confidential market and  
17 pricing analyses and confidential information regarding contracts for the sale or purchase

1 of electricity or fuel. This confidential business information is of significant commercial  
2 value, which could expose the Company and potential bidders to competitive injury if  
3 disclosure is unrestricted. Unrestricted disclosure could also be detrimental to the  
4 Company's customers and future resource acquisition plans.

5 3. It is substantially likely that Staff and others parties in this proceeding will  
6 seek to discover a large amount of information held by PacifiCorp, including confidential  
7 business information. "The Commission's standard blanket protective order is designed to  
8 facilitate discovery in cases involving discovery of large numbers of documents." *See In re*  
9 *Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).  
10 Issuance of a protective order will facilitate the production of relevant information and  
11 expedite the discovery process.

12 For the foregoing reasons, PacifiCorp requests entry of the Commission's standard  
13 protective order in this docket.

DATED: April 8, 2008.

A handwritten signature in black ink that reads "Natalie L. Hocken / P" followed by a horizontal line.

Natalie L. Hocken  
Vice President & General Counsel  
Pacific Power

Attorney for PacifiCorp

## CERTIFICATE OF SERVICE

I hereby certify that on this 9<sup>th</sup> day of April, 2008, I caused to be served, via E-Mail and Overnight Delivery (to those parties who have not waived paper service), a true and correct copy of the foregoing document on the following named person(s) at his or her last-known address(es) indicated below.

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Docket No. UM-1368

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