



Pacific Power
Rocky Mountain Power
825 NE Multnomah Street
Portland, Oregon 97232

September 2, 2009

VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
P0 Box 2148
Salem, OR 97308-2148

RE: PacifiCorp's Motion for Standard Protective Order
UM 1424

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

Sincerely,

Michelle. R. Mishoe

cc: Service List for UM 1424

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1424

RAINBOW YOUTH GOLF EDUCATION
PROGRAM, INC.,

v.

PACIFIC POWER

MOTION FOR PROTECTIVE ORDER

Expedited Consideration Requested

1

2 Pursuant to ORCP 36(C)(7) and OAR 860-012-0035(1)(k), PacifiCorp, d.b.a. Pacific
3 Power (“Company”), moves for the expedited entry of the Public Utility Commission of
4 Oregon’s (“Commission”) standard protective order in this proceeding. The Company
5 requests expedited consideration of this Motion in order to allow interested to execute the
6 protective order prior to the evidentiary hearing scheduled for October 8, 2009. Good cause
7 exists to issue a Protective Order to protect commercially-sensitive and confidential business
8 information related to the Company’s line extension estimates. In support of this Motion, the
9 Company states:

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

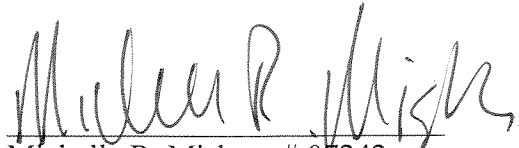
1 2. The Company anticipates that discovery in this proceeding, as well as the
2 evidentiary hearing, may include propriety cost data and models, commercially sensitive
3 pricing information, confidential market analyses and business projections, or confidential
4 employee data. The Company will be exposed to competitive injury if it is forced to make
5 unrestricted disclosure of its confidential business information.

6 3. It is substantially likely that other parties in this proceeding will seek to
7 discover information held by the Company, including confidential business information.
8 “The Commission’s standard blanket protective order is designed to facilitate discovery in
9 cases involving discovery of large numbers of documents.” *See In re Portland Extended Area*
10 *Service Region (UM261)*, Order No. 91-958 (1991). Issuance of a protective order will
11 facilitate the production of relevant information and expedite the discovery process.

12 4. The Company requests expedited consideration of this Motion to allow
13 parties who execute the Protective Order to expedite the discovery process in this proceeding.

14 For the foregoing reasons, PacifiCorp requests entry of the Commission’s standard
15 protective order in this docket.

16 DATED: September 2, 2009

17
18 Respectfully submitted,
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21 Michelle R. Mishoe, # 07242
22 Legal Counsel
23 Pacific Power

CERTIFICATE OF SERVICE

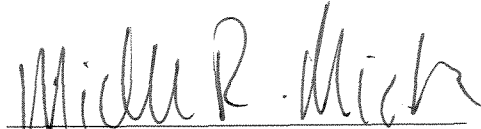
I hereby certify that served a true and correct copy of the Motion for Protective Order on all known parties to Docket No. UM 1424 on the date indicated below by email and first class mail to said person(s) at his or her last known address(es) indicated below.

Lisa D. Hardie
Administrative Law Judge
Oregon Public Utility Commission
550 Capital Street, N.E., Suite 215
Salem, OR 97301-2551

William E. Ray, Jr.
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Chiloquin, OR 97624

Barb Coughlin
Director, Customer & Regulatory Liaison
PacifiCorp
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DATED: September 2, 2009.


Michelle R. Mishoe

Counsel for Pacific Power