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September 15, 2009

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

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

Attn: Filing Center

RE: UM 1429 – Motion for Protective Order

PacifiCorp d/b/a Pacific Power (“PacifiCorp or the Company”) encloses for filing a Motion for a Protective Order in the above-referenced docket.

Please contact Joelle Steward, Regulatory Manager, at (503) 813-5542 for questions on this matter.

Sincerely,

Andrea L. Kelly
Vice President, Regulation

Enclosure

cc: Service List – UM 1429

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket No. UM-1429 on the following named person(s) below by e-mail and U.S. Mail (if paper service has not been waived) addressed to said person(s) at his or her last-known address(es) indicated below:

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1429

In the Matter of
PACIFICORP, dba PACIFIC POWER
Request for Approval of a 2009R 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 Power
2 (“Company”) moves for entry of the Commission’s standard protective order in this proceeding.

3 In support of this Motion, the Company states:

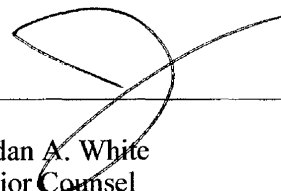
4 1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on
5 discovery of sensitive commercial information and other confidential business information. *See*
6 OAR 860-11-000(3) (adopting Oregon Rules of Civil Procedure (“ORCP”); ORCP 36(C)(7)
7 (providing protection against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

12 2. The Company anticipates that discovery in this proceeding may include proprietary
13 cost data and models, commercially-sensitive load and resource projections, RFP-related
14 information covered by confidentiality agreements, confidential market and pricing analyses and
15 confidential information regarding contracts for the sale or purchase of electricity or fuel. This
16 confidential business information is of significant commercial value, which could expose the
17 Company and potential bidders to competitive injury if disclosure is unrestricted. Unrestricted
18 disclosure could also be detrimental to the Company’s customers and future resource acquisition
19 plans.

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

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

DATED: September 15, 2009.



Jordan A. White
Senior Counsel
Pacific Power

Attorney for PacifiCorp