

WENDY McIndoo Direct (503) 595-3922 wendy@mcd-law.com

August 25, 2009

VIA ELECTRONIC AND U.S. MAIL

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

Re: UE 213 - In the Matter of the Application of Idaho Power Company for Authority to Increase its Rates and Charges for Electric Service in the State of Oregon

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and one copy of Idaho Power Company's Motion for Protective Order. A copy of this filing has been served on all parties to this proceeding as indicated on the attached service list.

Please contact me with any questions.

endy McIndoo

Very truly yours,

Wendy McIndoo Legal Assistant

1	CERTIFICATE OF SERVICE	
2	2 I hereby certify that I served a true and corr	ect copy of the foregoing documents on
3	3 the parties of record in Docket UE 213, on the date indicated below, by email and U.S. first	
4	4 class mail addressed to said person(s) at his or her	ast-known address(es) indicated below.
5	5	
6	Cordon reignifer	pert Jenks
7		zens' Utility Board of Oregon @oregoncub.org
8	- Carrier Darington	riona McCracken
9	9 Portland General Electric <u>catr</u>	zens' Utility Board of Oregon iona@oregoncub.org
10		
11	1 Portland General Electric Rich	er J. Richardson nardson & O'Leary
12	2	er@richardsonandoleary.com
13	Public Utility Commission of Oregon Dep	nael T. Weirich, Assistant AG partment of Justice
14	Salem, OR 97308-2148 Sale	2 Court Street NE em, OR 97301-4096
15	<u>judy.johnson@state.or.us</u> <u>micl</u> 5	nael.weirich@state.or.us
16		Taipale Minerals, LLC
17	Laura.patruno@eaglepicher.com Jim.	taipale@eaglepicher.com
18	dreading@mindspring.com	
19	DATED: August 25, 2009	
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22	Wendy N	Maludoo Maludoo
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1	BEFORE THE PUBLIC UTILITY COMMISSION
2	OF OREGON
3	UE 213
4	In the Matter of Idaho Power MOTION FOR PROTECTIVE ORDER Company's Filing of Revised Tariff
5	Schedules for Electric Service in Oregon.
6 _	Oregon.
7	
8	Pursuant to ORCP 36(C)(7) and OAR 860-012-0035(1)(k), Idaho Power Company
9	("Idaho Power" or "Company") moves for the entry of the Public Utility Commission of
10	Oregon's ("Commission") general protective order in this proceeding. Good cause exists to
11	issue a Protective Order to protect commercially sensitive and confidential business
12	information related to the Company's request for a general rate increase. In support of this
13	Motion, the Company states:

- 1. The Commission's rules authorize Idaho Power to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See OAR 860-11-000(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, Docket 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. The Company anticipates that parties to this docket may request proprietary cost data and models, commercially sensitive load and resource projections, confidential market analyses and business projections, confidential employee data, and confidential information regarding contracts for the purchase or sale of electric power, power services, or fuel. This

Motion, the Company states:

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1	confidential business information is of significant commercial value, which could expose the	
2	Company to competitive injury if disclosure is unrestricted.	
3	3. It is substantially likely that Staff and others in this proceeding will seek to	
4	discover a large amount of information held by Idaho Power, including confidential busines	
5	information. "The Commission's standard blanket protective order is designed to facilitate	
6	discovery in cases involving discovery of large numbers of documents." See In re Portland	
7	Extended Area Service Region, Docket UM 261, Order No. 91-958 (1991). Issuance of	
8	protective order will facilitate the production of relevant information and expedite the discovery	
9	process.	
10	For the foregoing reasons, Idaho Power requests entry of a standard Protective Order	
11	in this docket.	
12	DATED: August 25, 2009. McDowell & RACKNER PC	
13	() Jorga	
14	Lisa F. Rackner	
15	Adam Lowney	
16	IDAHO POWER COMPANY	
17	Donovan E. Walker Idaho Power Company	
18	P.O. Box 70	
	1221 W. Idaho Street Boise, Idaho 83707-0070	
19	Telephone: 208-388-5317	
20	Facsimile: 208-388-6936 E-mail: dwalker@idahopower.com	
21		
22	Attorneys for Idaho Power Company	
23		
24		
25		
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