

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

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Public Utility Commission of Oregon  
Administrative Hearing Division

LC 48

In the Matter of Portland General Electric ) MOTION FOR PROTECTIVE  
Company ) ORDER  
)  
2009 Integrated Resource Plan )

Pursuant to ORCP 36(C)(7) and OAR 860-12-0035(1)(k), Portland General Electric Company (PGE) moves for entry of the Commission's standard protective order in this proceeding. In support of this Motion, PGE states:

1. The Commission's rules authorize PGE to seek reasonable restrictions on discovery of sensitive commercial information 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").

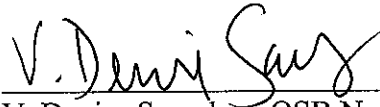
2. PGE is filing a draft 2009 Integrated Resource Plan concurrent with this Motion for Approval of Protective Order. PGE anticipates that discovery in this proceeding may include proprietary cost data and models, information covered by confidentiality agreements, commercially sensitive load and resource projections and other confidential analyses. PGE 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.

THEREFORE, for the reasons stated above, PGE requests entry of the Commission's standard protective order in this proceeding.

Respectfully submitted, this 5<sup>th</sup> day of November, 2009.

V. DENISE SAUNDERS



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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing **PORTLAND GENERAL ELECTRIC COMPANY'S 2009 INTEGRATED RESOURCE PLAN** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. LC 43.

Dated at Portland, Oregon, this 5th day of November 2009.



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Randy Dahlgren

On behalf of Portland General Electric Company

**eDockets**

**Docket Summary**

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**Docket No:** LC 43      **Docket Name:** PORTLAND GENERAL ELECTRIC

[Print Summary](#)

**Subject Company:** PORTLAND GENERAL ELECTRIC

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY 2007 Integrated Resource Plan. Filed by Randy Dahlgren.

**Filing Date:** 6/29/2007

**Public Mtg:** 3/31/2008

**Final Order:** 08-246

**Order Signed:** 5/6/2008

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ACTIONS	SERVICE LIST (Parties)	SCHEDULE
W=Waive Paper service	C=Confidential HC=Highly Confidential	Sort by Last Name      Sort by Company Name
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