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November 18, 2013

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

Public Utility Commission of Oregon  
3930 Fairview Industrial Dr. S.E.  
Salem, OR 97302-1166

Attn: Filing Center

**RE: UM 1670—PacifiCorp's Motion for Standard Protective Order**

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion for Standard Protective Order. As indicated on the attached certificate of service, a copy of this filing is being served on all parties on the service list.

If you have questions about this filing, please contact Bryce Dalley, Director of Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,

*William R. Griffith / AS*  
William R. Griffith  
Vice President, Regulation

Enclosures

cc: Service List—UM 1670

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1670**

In the Matter of

COLUMBIA BASIN ELECTRIC  
COOPERATIVE, INC.,

Complainant;

vs.

PACIFICORP d/b/a PACIFIC POWER,

and

NORTH HURLBURT WIND, LLC.,

Defendants.

PACIFICORP'S MOTION FOR  
STANDARD PROTECTIVE ORDER

1           Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power  
2 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for  
3 entry of a standard protective order in this proceeding. Good cause exists to issue a  
4 protective order to protect commercially sensitive and confidential business information  
5 related to master electric service agreements and customer-specific information.

6           The Commission's rules authorize PacifiCorp to seek reasonable restrictions on  
7 discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission's  
8 standard protective order is designed to allow the broadest possible discovery consistent with

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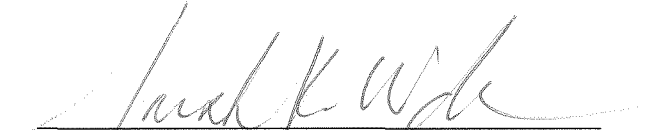
<sup>1</sup> See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing 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").

1 the need to protect confidential information.<sup>2</sup> PacifiCorp requests this protective order to  
2 facilitate the communication of information between the parties.

3 PacifiCorp d/b/a Pacific Power (PacifiCorp), North Hurlburt Wind, LLC. (North  
4 Hurlburt), and Columbia Basin Electric Cooperative, Inc. (CBEC) were unable to reach joint  
5 stipulated facts by October 31, 2013, and therefore will be filing opening testimony by  
6 January 17, 2013, in accordance with the alternate adopted procedural schedule. Issuance of  
7 a protective order will facilitate the production of relevant information and expedite the  
8 discovery process.

9 For these reasons, PacifiCorp respectfully requests that the Commission enter its  
10 standard protective order in this docket.

Respectfully submitted this 18<sup>th</sup> day of November, 2013.

  
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Sarah K. Wallace  
Senior Counsel  
PacifiCorp d/b/a Pacific Power

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<sup>2</sup> OAR 860-001-0080(2).

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Motion for Protective Order on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

**UM 1670**

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Dated this 18<sup>th</sup> of November 2013.

  
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Carrie Meyer  
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