

McDowell Rackner & Gibson PC



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June 16, 2014

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: Docket UM 1701

Attention Filing Center:

Attached for filing in the above-referenced docket is an original and one copy of Iberdrola Renewables, LLC's Motion for Protective Order.

A copy of this filing has been served on all parties to this proceeding. Please contact this office with any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Katherine McDowell', written over the text 'Very truly yours,'.

Katherine McDowell

Enclosures

cc: Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1701**

4 In the Matter of
5 **IBERDROLA RENEWABLES, LLC**
6 2013 Renewable Portfolio Standard
7 Compliance Report

MOTION FOR PROTECTIVE ORDER

8 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Iberdrola Renewables, LLC
9 (“Iberdrola” or “Company”) moves the Public Utility Commission of Oregon (“Commission”) for
10 entry of standard protective order in this proceeding. Good cause exists to issue a Protective
11 Order to protect commercially sensitive and confidential business information related to the
12 Company’s filed 2013 Renewable Portfolio Standard Compliance Report (RPS).

13 In support of this Motion, the Company states:

14 1. The Commission’s rules authorize Iberdrola to seek reasonable restrictions on
15 discovery of trade secrets and other confidential business information. See 860-001-0080;
16 ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other
17 confidential research, development, or commercial information”); see also *In re Investigation*
18 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
19 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a
20 party to trade secrets and other confidential commercial information” and “to facilitate the
21 communication of information between litigants”).

22 2. On May 30, 2014, Iberdrola filed its 2013 Renewable Portfolio Standard
23 Compliance Report. The report contains confidential material, including commercially
24 sensitive customer load and power pricing information. Public disclosure of the confidential
25 information could be detrimental to Iberdrola and its customers.
26

1 3. Issuance of a protective order will facilitate the production of relevant information
2 and expedite the discovery process. See *In re Portland Extended Area Service Region*,
3 Docket UM 261, Order No. 91-958 (1991). .

4 For the foregoing reasons, Iberdrola requests entry of a standard Protective Order in
5 this docket.

6 DATED: June 16, 2014.

McDOWELL RACKNER & GIBSON PC

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9 _____
Katherine McDowell

10 **IBERDROLA RENEWABLES, LLC**

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12 Iberdrola Renewables, LLC
13 1125 NW Couch Street, Suite 700
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26 Attorneys for Iberdrola Renewables, LLC

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Certificate of Service

I hereby certify that I served a true and correct copy of the foregoing document In Docket UM 1701 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below

Adam Bless
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Michael Weirich
Oregon Department of Justice
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Salem, OR 97301-4796
michael.weirich@state.or.u

DATED: June 16, 2014.



Wendy McIndoo
Office Manager