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December 5, 2014

VIA ELECTRONIC AND U.S. MAIL

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

Re: UE 293 In The Matter of IDAHO POWER COMPANY's 2015 Annual Power Cost Update

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Attention Filing Center:

Enclosed for filing in the above-referenced matter 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. Please contact this office with any questions.

Very truly yours,

Wendy McIndoo Office Manager

Enclosures cc: Service List

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2	UE 293	
3	In the Metter of	î
4	In the Matter of	MOTION FOR PROTECTIVE ORDER
_	IDAHO POWER COMPANY	
5	2015 Annual Power Cost Update	
6	•	

PAGE 1 -

Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's ("Commission") general protective order in this proceeding. Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information related to the Company's filed 2015 Annual Power Cost Update.

In support of this 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 860-001-0080; 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. On October 21, 2014, Idaho Power filed its 2015 Annual Power Cost Update. It is expected that certain documents related to the filing will contain confidential material, including but not limited to proprietary cost data and models, commercially sensitive load and resource projections, confidential market analyses and business projections, and confidential information regarding contracts for the purchase or sale of electric power, power services, or

1	fuel. Public disclosure of the confidential information could be detrimental to Idaho Power and		
2	its customers.		
3	3. It is substantially likely th	at Staff and others in this proceeding will seek to	
4	discover confidential business informati	ion. "The Commission's standard blanket protective	
5	order is designed to facilitate discover	ry in cases involving discovery of large numbers of	
6	documents." See In re Portland Extend	ded Area Service Region, Docket UM 261, Order No.	
7	91-958 (1991). Issuance of a protective order will facilitate the production of relevant		
8	information and expedite the discovery process.		
9	For the foregoing reasons, Idaho Power requests entry of a standard Protective Order		
10	in this docket.		
11	DATED: December 5, 2014	McDowell Rackner & Gibson PC	
12	DATED: December 5, 2014.		
13		Lisa F. Rackner	
14		Adam Lowney	
15		IDAHO POWER COMPANY	
16		Lisa Nordstrom Idaho Power Company	
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20		E-mail: Inordstrom@idahopower.com	
21		Attorneys for Idaho Power Company	
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1	CERTIFICATE OF SERVICE		
2	I hereby certify that I served a true and correct copy of the foregoing document in		
3	Docket UE 293 on the following named person(s) on the date indicated below by email		
4	addressed to said person(s) at his or her last-known address(es) indicated below.		
5			
6	OPUC Dockets Robert Jenks		
7	Citizens' Utility Board of Oregon Citizens' Utility Board of Oregon dockets@oregoncub.org bob@oregoncub.org		
8	Sommer Templet Michael T. Weirich Citizens' Utility Board of Oregon Department of Justice		
9	sommer@oregoncub.org Michael.weirich@state.or.us		
10	John Crider Public Utility Commission of Oregon		
11	john.crider@state.or.us		
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13	DATED: December 5, 2014		
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15	Wendy Malndoo Wendy Malndoo		
16	Office Manager		
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