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November 12, 2015

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-1166

Attn: Filing Center

**RE: UM 1719—PacifiCorp's Motion for General Protective Order**

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion for General Protective Order.

If you have questions about this filing, please contact Erin Apperson, Manager of Regulatory Affairs, at (503) 813-6642.

Sincerely,

A handwritten signature in cursive script that reads "R. Bryce Dalley" followed by a small flourish.

R. Bryce Dalley  
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1719**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Investigation to Explore Issues Related to a  
Renewable Generator's Contribution to  
Capacity.

PACIFICORP'S MOTION FOR  
GENERAL 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.

4 The Commission's rules authorize PacifiCorp to seek reasonable restrictions on  
5 discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission's  
6 standard protective order is designed to allow the broadest possible discovery consistent with  
7 the need to protect confidential information.<sup>2</sup> PacifiCorp requests this protective order to  
8 facilitate the communication of information between the parties and expedite the discovery  
9 process.

10 It is expected that certain information in this proceeding will contain confidential  
11 information, including but not limited to commercially sensitive load and resource  
12 projections, confidential market analyses and business projections, and confidential  
13 information regarding contracts for the purchase or sale of electric power. Furthermore, it is

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<sup>1</sup> See OAR 860-001-0000(1) (adopting the 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 trade secrets and other confidential commercial information and "to facilitate the communication of information between litigants").

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

1 substantially likely that the staff and other parties to this proceeding will seek to discover  
2 confidential business information. Public disclosure of the confidential information could be  
3 detrimental to the Company and its respective customers. Accordingly, good cause exists to  
4 issue a protective order to protect commercially sensitive and confidential business  
5 information.

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

Respectfully submitted this 12<sup>th</sup> day of November 2015.

By:



Dustin Till  
Senior Counsel  
PacifiCorp d/b/a Pacific Power