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May 26, 2015

VIA ELECTRONIC AND U.S. MAIL

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

Re: UM 1725 – In the Matter of IDAHO POWER COMPANY Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term

Attention Filing Center:

Attached for filing in the above-captioned docket is Idaho Power's Motion for Protective Order.

Please contact this office with any questions.

Very truly yours,

Wendy McIndos

Wendy McIndoo Office Manager

Enclosures cc: ALJ Shani Pines UM 1725 Service List

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UM 1725			
3	In the Matter of			
4	IDAHO POWER COMPANY,	MOTION FOR PROTECTIVE ORDER		
5	Application to Lower Standard Contract			
6	Eligibility Cap and to Reduce the Standard Contract Term, for Approval of Solar			
7	Integration Charge, and for Change in Resource Sufficiency Determination			
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Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho 9 10 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 11 12 Protective Order to protect commercially sensitive and confidential business information related to the Company's Application to Lower Standard Contract Eligibility Cap and to Reduce the 13 Standard Contract Term, for Approval of Solar Integration Charge, and for Change in Resource 14 Sufficiency Determination, and the Motion for Temporary Stay of its Obligation to Enter into New 15 Power Purchase Agreements with Qualifying Facilities (Motion to Stay), all consolidated in this 16 17 docket.

18 In support of this Motion, the Company states:

19 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; 20 ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other 21 22 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 23 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a 24 party to trade secrets and other confidential commercial information" and "to facilitate the 25 26 communication of information between litigants").

2. On April 24, 2015, Idaho Power filed the above-captioned applications and Motion to Stay. 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 fuel. Public disclosure of the confidential information could be detrimental to Idaho Power and its customers.

8 3. It is substantially likely that Staff and others in this proceeding will seek to discover
9 confidential business information. "The Commission's standard blanket protective order is
10 designed to facilitate discovery in cases involving discovery of large numbers of documents."
11 See In re Portland Extended Area Service Region, Docket UM 261, Order No. 91-958 (1991).
12 Issuance of a protective order will facilitate the production of relevant information and expedite
13 the discovery process.

For the foregoing reasons, Idaho Power requests entry of a standard Protective Orderin this docket.

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