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June 10, 2015

***VIA ELECTRONIC FILING***

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

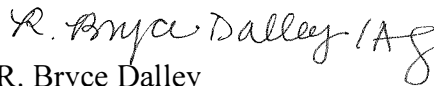
Attn: Filing Center

**RE: UE 298 —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.

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

Sincerely,

  
R. Bryce Dalley  
Vice President, Regulation

Enclosures

cc: Service List—UE 298

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UE 298**

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER,  
2014 Power Cost Adjustment Mechanism.

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 the Company’s net power costs, including forecasts of market prices and contract  
6 provisions with third-parties.

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

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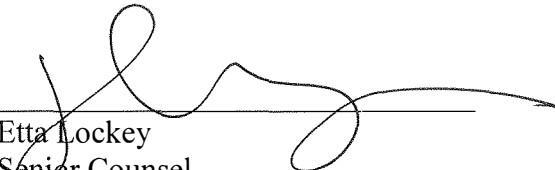
<sup>1</sup> See OAR 860-001-0000(1) (adopting the ORCP); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information”). See also *In re Investigation into the Cost of Providing Telecommunication Service*, 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            For these reasons, PacifiCorp respectfully requests that the Commission enter its  
2 standard protective order in this docket.

Respectfully submitted this 10<sup>th</sup> day of June, 2015.

By:



Etta Locky  
Senior Counsel  
PacifiCorp d/b/a Pacific Power