

# McDowell Rackner & Gibson PC



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September 23, 2015

## VIA ELECTRONIC EMAIL AND UPS

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

**Re: Docket LC 63 - Idaho Power Company's 2015 Integrated Resource Plan ("IRP")**

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

Please contact this office with any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo  
Office Manager

Attachment

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

3 **LC 63**

4 In the Matter of  
5 IDAHO POWER COMPANY  
6 2015 Integrated Resource Plan.

MOTION FOR PROTECTIVE ORDER

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8 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company (“Idaho  
9 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s  
10 (“Commission”) general protective order in this proceeding. Good cause exists to issue a  
11 Protective Order to protect commercially sensitive and confidential business information related  
12 to the Company’s 2015 Integrated Resource Plan (“IRP”).

13 In support of this Motion, the Company states:

14 1. The Commission’s rules authorize Idaho Power to seek reasonable restrictions on  
15 discovery of trade secrets and other confidential business information. See OAR 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 June 30, 2015, Idaho Power filed its 2015 IRP. Idaho Power anticipates that  
23 discovery in this proceeding will include requests for proprietary business and financial  
24 information. Idaho Power will be exposed to competitive injury if it is forced to make unrestricted  
25 disclosure of its confidential business information. “The Commission’s standard blanket  
26 protective order is designed to facilitate discovery in cases involving discovery of large numbers

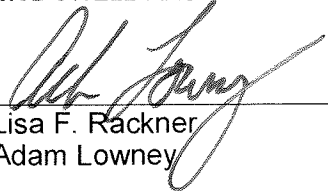
1 of documents.” See *In re Portland Extended Area Service Region*, Docket UM 261, Order No.  
2 91-958 (1991). Issuance of a protective order will facilitate the production of relevant information  
3 and expedite the discovery process.

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

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DATED: September 23, 2015.

McDOWELL RACKNER & GIBSON PC



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Lisa F. Rackner  
Adam Lowney

**IDAHO POWER COMPANY**

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