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May 31, 2016 Via E-Mail and U.S. Mail PUC Filing Center Public Utility Commission of Oregon Post Office Box 1088 Salem, OR 97308-1088

Re: Docket UM 1779

Attention Filing Center:

Shell Energy North America (US), L.P. ("Shell Energy") submits its Renewable Portfolio Standard Oregon Compliance Report for 2015 and Motion for Protective Order.

Please note that portions of the report are CONFIDENTIAL, containing commercially sensitive and confidential business information and are provided under seal pursuant to OAR 860-001-0070.

Please contact the undersigned with any questions.

Very truly yours,

Marcie A. Milner

Vice President, Regulatory Affairs Shell Energy North America (US), L.P.

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UM 1779 3 4 In the Matter of 5 Shell Energy North America (US), L.P. 6 2015 Renewable Portfolio Standard 7 Compliance Report 8 9 10 11 12 13 In support of this Motion, the Company states: 14 1. 15 16

MOTION FOR PROTECTIVE ORDER

Pursuant to ORCP 36(c)(7) and OAR 860-001-0080, Shell Energy North America (US), L.P. ("Shell Energy" or "Company") moves the Public Utility Commission of Oregon ("Commission") for entry of a standard 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 Renewable Portfolio Standard Compliance Report ("RPS").

- The Commission's rules authorize Shell Energy 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 350, Order No. 91-6500 (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. Concurrently with this motion, Shell Energy is filing its 2015 Renewable Portfolio Standard Compliance Report. The report contains confidential material, including commercially sensitive customer load and power pricing information. Public disclosure of the confidential information could be detrimental to Shell Energy and its customers.

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3. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process. See In re Portland Extended Area Service Region, Docket UM 261, Order No. 91-958 (1991). For the foregoing reasons, Shell Energy requests entry of a standard Protective Order in this docket. Dated: May 31, 2016 Shell Energy North America (US), L.P. Marcie Milner Shell Energy North America 4445 Eastgate Mall, Suite 100 San Diego, CA 92121 marcie.milner@shell.com