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January 6, 2017

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 1812—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 Natasha Siores at (503) 813-6583.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bryce Dalley". The signature is written in a cursive style and is positioned above the printed name.

R. Bryce Dalley
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1812

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON

PacifiCorp’s Transportation Electrification
Demonstration and Development Pilot
Program.

Motion for Protective Order by PacifiCorp
d/b/a Pacific Power

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 cost of services and equipment the Company intends to procure through
6 competitive solicitations.

7 The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on
8 discovery of trade secrets and other confidential business information.¹ The Commission’s
9 standard protective order is designed to allow the broadest possible discovery consistent with
10 the need to protect confidential information.² PacifiCorp has received or expects to receive
11 discovery requests in these proceedings, including requests for propriety cost data and
12 models, commercially sensitive pricing information, confidential market analyses and

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); 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 “the rights of a party to trade secrets and other confidential commercial information” and “to facilitate the communication of information between litigants”).

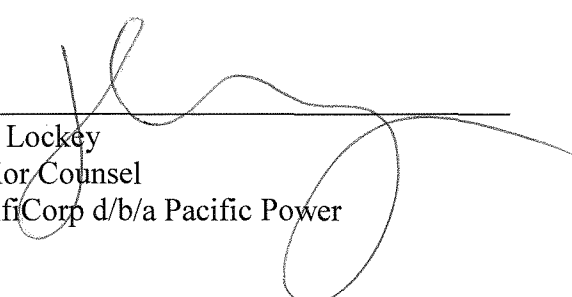
² OAR 860-001-0080(2).

1 business projections, or confidential information regarding contracts for the purchase or sale
2 of electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if
3 it is forced to make unrestricted disclosure of its confidential business information.

4 It is also substantially likely that the parties to these proceedings will seek to discover
5 further information held by PacifiCorp, including confidential business information. Issuance
6 of a protective order will facilitate the production of relevant information and expedite the
7 discovery process.

8 For these reasons, PacifiCorp respectfully requests that the Commission enter its
9 standard protective order in this docket. The Company requests expedited consideration of
10 this motion to allow parties who execute the protective order to obtain prompt responses to
11 discovery requests.

Respectfully submitted this 6th day of January, 2017.



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