

CHRISTA BEARRY
Legal Administrative Assistant
cbearry@idahopower.com
(208) 388-5996

March 23, 2018

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: **Docket No. UM 1821**
In the Matter of Idaho Power Company's Application for Deferral of Costs
Associated with Participation in an Energy Imbalance Market (EIM)

Dear Filing Center:

Attached for electronic filing is Idaho Power Company's Motion for Protective Order.

Sincerely,


Christa Bearry

Attachment

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UM 1821**

4 In the Matter of
5 IDAHO POWER COMPANY,
6 Application for Deferral of Costs Associated
7 with Participation in an Energy Imbalance
8 Market (EIM).

MOTION FOR PROTECTIVE ORDER

9 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company
10 (“Idaho Power” or “Company”) moves for the entry of the Public Utility Commission of
11 Oregon’s (“Commission”) general protective order in this proceeding. Good cause exists
12 to issue a Protective Order to protect commercially sensitive and confidential business
13 information that is considered to be of a trade secret, privileged, or confidential nature.

14 In support of this Motion, the Company states:

15 1. The Commission’s rules authorize reasonable restrictions on discovery of
16 trade secrets and other confidential business information. See 860-001-0080; ORCP
17 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other
18 confidential research, development, or commercial information”). See also *In re*
19 *Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351,
20 Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to
21 protect “the rights of a party to trade secrets and other confidential commercial
22 information” and “to facilitate the communication of information between litigants”).

23 2. On March 8, 2017, Idaho Power filed its Application for an accounting order
24 authorizing it to defer for later ratemaking treatment the incremental costs associated with
25 participation in the western Energy Imbalance Market. Certain documents related to Idaho
26 Power’s reauthorization for deferral will contain confidential information, including, but not


1 limited to, confidential information regarding contracts or purchases. "The Commission's
2 standard blanket protective order is designed to facilitate discovery in cases involving
3 discovery of large numbers of documents." See *In re Portland Extended Area Service*
4 *Region*, Docket UM 261, Order No. 91-958 (1991). Issuance of a protective order will
5 facilitate the production of relevant information and expedite the discovery process.

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

8 DATED: March 23, 2018.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IDAHO POWER COMPANY



Julia A. Hilton, Senior Counsel (OSB #142457)
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707