

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1887**

PORTLAND GENERAL ELECTRIC  
COMPANY,

Complainant,

v.

COVANTA MARION, INC.

Respondent.

COVANTA MARION INC.'S MOTION  
FOR GENERAL PROTECTIVE  
ORDER

**EXPEDITED CONSIDERATION  
REQUESTED**

Pursuant to OAR 860-001-0080(2), Covanta Marion, Inc.'s ("Covanta") moves for entry of the Commission's general protective order in this proceeding. As good cause for this motion, Covanta states:

1.

The Commission's rules authorize Covanta to seek reasonable restrictions on the disclosure of trade secrets and other confidential business information. *See* OAR 860-11-0000(3) (adopting Oregon Rules of Civil Procedure ("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 (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").

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2.

In aid of a resolution of the matters at issue in this proceeding, Covanta and Portland General Electric (“PGE”) intend to submit to the Commission stipulated facts. The stipulated facts may include exhibits containing propriety, confidential and commercially sensitive business information. Covanta may be exposed to competitive injury if it were to make unrestricted disclosure of such confidential business information.

3.

Issuance of the Commission’s standard protective order in this case will facilitate the full discourse of relevant information and expedite the resolution of this proceeding.

4.

Covanta requests expedited consideration for this Motion so that all persons who execute the protective order to obtain prompt access to any such confidential informational exhibits.

5.

Counsel for Covanta has contacted counsel for PGE and intervener Marion County, and neither opposes this motion.

For the following reasons, Covanta requests expedited entry of the Commission’s general protective order in this docket.

DATED this 15<sup>th</sup> day of December, 2017.

Respectfully submitted,

/s Richard Lorenz

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Of Attorneys for *Covanta Marion Inc.*