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May 19, 2022

***VIA ELECTRONIC FILING***

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

**RE: UM \_\_\_\_—PacifiCorp’s 2021 Renewable Portfolio Standards Compliance Report—  
Motion for General Protective Order (*Expedited Consideration Requested*)**

PacifiCorp d/b/a Pacific Power intends to file its 2021 Renewable Portfolio Standards Compliance Report on or about June 1, 2022. To facilitate review of materials in this proceeding, PacifiCorp encloses for filing its Motion for General Protective Order.

If you have questions about this filing, please contact Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,

Shelley McCoy  
Director, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM \_\_\_\_\_

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER  
2021 Renewable Portfolio Standard  
Compliance Report.

**PACIFICORP’S MOTION FOR  
PROTECTIVE ORDER**  
*(Expedited Consideration Requested)*

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and Oregon Administrative Rule (OAR) 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp) 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 PacifiCorp’s renewable portfolio standard compliance position and strategies.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission’s standard protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.<sup>2</sup> PacifiCorp expects to receive discovery requests related to the 2021 Renewable Portfolio Standard Compliance Report, including requests for proprietary cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, or confidential information regarding

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<sup>1</sup> See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(1) (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 No. 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”).

<sup>2</sup> OAR 860-001-0080(2).

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

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

For these reasons, PacifiCorp respectfully requests that the Commission enter its standard protective order in this docket. PacifiCorp additionally requests expedited consideration of this motion so that a protective order may be in place for PacifiCorp's filing on or before June 1, 2022.

Respectfully submitted this 19<sup>th</sup> day of May, 2022.



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