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March 25, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

**RE: UE ___—PacifiCorp's Motion for General Protective Order – Expedited
Consideration Requested**

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion for General Protective Order – Expedited Consideration Requested.

If you have questions about this filing, please contact Erin Apperson, Manager of Regulatory Affairs, at (503) 813-6642.

Sincerely,

A handwritten signature in cursive script that reads "R Bryce Dalley".

R. Bryce Dalley
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE ____

In the Matter of
PACIFICORP d/b/a PACIFIC POWER's
2017 Transition Adjustment Mechanism.

MOTION FOR GENERAL
PROTECTIVE ORDER
Expedited Consideration Requested

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 general protective order in the Company's 2017 Transition Adjustment Mechanism
4 (TAM) proceeding and all future TAM proceedings. Good cause exists to issue a Protective
5 Order to protect commercially sensitive and confidential business information related to the
6 Company's 2017 TAM filing.

7 The Commission previously found good cause to issue protective orders in this
8 proceeding. *Re PacifiCorp, dba Pacific Power's 2011 Transition Adjustment Mechanism*
9 *Schedule 200, Cost-Based Supply Service, Docket UE 216, Order No. 10-069 (February 25,*
10 *2010).* The Company's need for a protective order has not changed. However, the
11 Commission's general protective order has changed since the Commission last issued a
12 protective order in a TAM proceeding, so the Company is requesting that the Commission
13 issue its current general protective order.

14 The Company is filing this motion as the first pleading in the Company's 2017 TAM
15 proceeding in order to have a protective order in place and effective in this docket when the
16 Company files its 2017 TAM on April 1, 2016. To that end, the Company requests expedited

1 consideration of this Motion in order to allow parties that execute the protective order to
2 obtain prompt access to the confidential testimony filed in support of the 2017 TAM and to
3 expedite discovery in this proceeding. The Company also requests that the Commission
4 apply the protective order issued in the proceeding to all future TAM proceedings in
5 accordance with the TAM Guidelines adopted by the Commission, as described below.
6 Good cause exists to issue a Protective Order to protect commercially sensitive and
7 confidential business information related to the Company's TAM filing.

8 In support of this motion, the Company states:

9 1. The Commission's rules allow PacifiCorp to request the issuance of a
10 protective order to limit disclosure of information that falls within the scope of Oregon Rules
11 of Civil Procedure 36(C)(7).

12 2. In compliance with Commission Order No. 05-1050 in Docket UE 170,
13 PacifiCorp is required to file its TAM on an annual basis. The purpose of the TAM filing is
14 to update net power costs for the upcoming year and to set the transition adjustment for
15 Oregon customers who choose direct access in the November open enrollment window.

16 3. The TAM Guidelines, approved by the Commission in Order No. 09-274,
17 PacifiCorp 2010 Transition Adjustment Mechanism, Docket No. UE 207, include a
18 commitment to make any protective order an ongoing protective order that will continue to
19 be effective in future TAM proceedings. Order No. 09-274 (TAM Guidelines at A.7).

20 4. The Commission previously issued a protective order applicable to
21 PacifiCorp's TAM proceedings on February 25, 2010. *Re PacifiCorp, dba Pacific Power's*
22 *2011 Transition Adjustment Mechanism Schedule 200, Cost-Based Supply Service*, Docket
23 UE 216, Order No. 10-069.

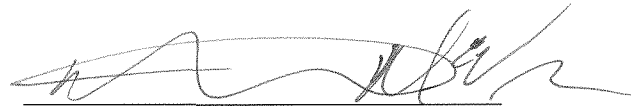
1 5. On August 25, 2015, the Commission issued Order No. 15-243, amending its
2 administrative rules regarding the use of protective orders in Commission proceedings and
3 revising the standard protective order.

4 6. The Company anticipates that parties to this docket may request proprietary
5 cost data and models, commercially sensitive load and resource projections, confidential
6 market analyses and business projections, and confidential information regarding contracts
7 for the purchase or sale of electric power, power services, or fuel. This confidential business
8 information is of significant commercial value, which could expose the Company to
9 competitive injury if disclosure is unrestricted.

10 For these reasons, PacifiCorp respectfully requests that the Commission enter its
11 current general protective order in this docket.

Respectfully submitted this 25th day of March 2016.

By:



Matthew D. McVee
Assistant General Counsel
PacifiCorp d/b/a Pacific Power