

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET UA _____

In the Matter of the Joint Application of
PacifiCorp and Umatilla Electric Cooperative
for Approval of Allocation of Service
Territory for a Specific Customer

**MOTION FOR PROTECTIVE
ORDER**

Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, PacifiCorp, d.b.a. Pacific Power, and Umatilla Electric Cooperative (“UEC”) (collectively the “Parties”) move for the entry of the Public Utility Commission of Oregon’s (“Commission”) general protective order in this proceeding (“Motion”). Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information contained in or related to a Customer Allocation Agreement (“Agreement”) executed by both Parties on or about July 21, 2015.

In support of this Motion, the Parties state:

1. The Commission’s rules authorize the Parties to seek reasonable restrictions on discovery of confidential business information. *See* 860-001-0080; ORCP 36(C)(7) (providing protection against unrestricted discovery of “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. The Parties have filed the above-captioned application on the same day as this

Motion. The Agreement and certain other documents related to the filing contain confidential material, including but not limited to commercially sensitive load and business projections, and confidential information regarding contracts for the purchase or sale of electric power. Public disclosure of the confidential information could be detrimental to the Parties and to the customer affected by the Agreement.

3. It is possible that Staff or others in this proceeding may seek to discover confidential business information. “The Commission’s standard blanket protective order is designed to facilitate discovery in cases involving discovery of large numbers of documents.” *See In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991). Issuance of a protective order would facilitate the production of relevant information and expedite the discovery process.

For the foregoing reasons, the Parties request entry of a standard Protective Order in this docket.

DATED: August 20, 2015.

Respectfully submitted,

PACIFICORP

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