



WENDY MCINDOO
Direct (503) 595.3922
wendy@mcrl-law.com

March 21, 2016

VIA ELECTRONIC MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: UE 305 – Idaho Power Company’s 2015 Annual Power Supply Expense True-Up

Attention Filing Center:

Enclosed in the above-referenced docket is an electronic copy of a Motion for Protective Order.

Please contact me with any questions.

Very truly yours,

Wendy McIndoo
Office Manager

Attachment

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 305**

4 In the Matter of
5 IDAHO POWER COMPANY
6 2015 Annual Power Supply Expense
7 True-Up

MOTION FOR PROTECTIVE ORDER

8 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company (“Idaho
9 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s
10 (“Commission”) general protective order in this proceeding. Good cause exists to issue a
11 Protective Order to protect commercially sensitive and confidential business information
12 related to the Company’s filed 2015 Annual Power Cost Update.

13 In support of this Motion, the Company states:

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

22 2. February 19, 2016, Idaho Power filed its 2015 Annual Power Supply Expense
23 True-Up. It is expected that certain documents related to the filing will contain confidential
24 material, including but not limited to proprietary cost data and models, commercially sensitive
25 load and resource projections, confidential market analyses and business projections, and
26

1 confidential information regarding contracts for the purchase or sale of electric power, power
2 services, or fuel. Public disclosure of the confidential information could be detrimental to
3 Idaho Power and its customers.

4 3. It is substantially likely that Staff and others in this proceeding will seek to
5 discover confidential business information. "The Commission's standard blanket protective
6 order is designed to facilitate discovery in cases involving discovery of large numbers of
7 documents." See *In re Portland Extended Area Service Region*, Docket UM 261, Order No.
8 91-958 (1991). Issuance of a protective order will facilitate the production of relevant
9 information and expedite the discovery process.

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

12 DATED: March 21, 2016.

13 McDOWELL RACKNER & GIBSON PC

14 
15 Adam Lowney

16 **IDAHO POWER COMPANY**

17 Lisa Nordstrom
18 Idaho Power Company
19 P.O. Box 70
20 1221 W. Idaho Street
21 Boise, Idaho 83707-0070
22 Telephone: 208-388-5825
23 Facsimile: 208-388-6936
24 E-mail: lnordstrom@idahopower.com

25 Attorneys for Idaho Power Company
26