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June 16, 2016

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UE 309—PacifiCorp's Motion for General Protective Order

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

If you have questions about this filing, please contact Natasha Siores at (503) 813-6583.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 309

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
2015 Power Cost Adjustment Mechanism.

PACIFICORP'S MOTION FOR
STANDARD PROTECTIVE ORDER

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 standard protective order in this proceeding. Good cause exists to issue a
4 protective order to protect commercially sensitive and confidential business information
5 related to the Company's net power costs, including market prices and contract provisions
6 with third-parties.

7 The Commission's rules authorize PacifiCorp to seek reasonable restrictions on
8 discovery of trade secrets and other confidential business information.¹ The Commission's
9 standard protective order is designed to allow the broadest possible discovery consistent with
10 the need to protect confidential information.² PacifiCorp requests the issuance of a protective
11 order to facilitate the communication of information between the parties and expedite the
12 discovery process.

13 PacifiCorp expects to receive discovery requests related to its 2015 Power Cost
14 Adjustment filing, including requests for propriety cost data and models, commercially

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); 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*, 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 OAR 860-001-0080(2).


1 sensitive pricing information, confidential market analyses and business projections, or
2 confidential information regarding contracts for the purchase or sale of electric power, power
3 services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make
4 unrestricted disclosure of its confidential business information.

5 It is also substantially likely that the parties to these proceedings will seek to discover
6 further information held by PacifiCorp, including confidential business information.

7 Issuance of a protective order will facilitate the production of relevant information and
8 expedite the discovery process.

9 For these reasons, PacifiCorp respectfully requests that the Commission enter its
10 standard protective order in this docket.

Respectfully submitted this 16th day of June, 2016.


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