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April 11, 2017

**VIA ELECTRONIC FILING**

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

**Re: Docket UE 320 – Idaho Power Company’s 2016 Annual Power Supply Expense True-Up**

Attention Filing Center:

Attached for filing in the above-referenced docket is an electronic copy of Idaho Power Company’s Motion for Protective Order. Please contact this office with any questions.

Very truly yours,

Wendy McIndoo  
Office Manager

Attachment

cc: ALJ Patrick Power

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

3 **UE 320**

4 In The Matter of the Application of  
5 IDAHO POWER COMPANY  
6 2016 Annual Power Supply Expense True-Up  
7

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 related  
12 to the Company’s filed 2016 Annual Power Supply Expense True-Up.

13 In support of this Motion, the Company states:

14 1. The Commission’s rules authorize Idaho Power to seek reasonable restrictions on  
15 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. On February 24, 2017, Idaho Power filed its 2016 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 Idaho  
3 Power and its customers.

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

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

12 DATED: April 11, 2017

13 McDOWELL RACKNER GIBSON PC

14   
15 Adam Lowney

16 **IDAHO POWER COMPANY**

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