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Portland, Oregon 97232

July 19, 2017

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UE 327—PacifiCorp's Motion for Protective Order

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

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

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosure

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Motion for Protective Order on the parties listed below via electronic mail and/or overnight delivery in compliance with OAR 860-001-0180.

Service List UE 327

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Dated this 19th day of July, 2017.



Jennifer Angell
Supervisor, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 327

In the Matter of

PACIFICORP d/b/a PACIFIC POWER
2016 Power Cost Adjustment Mechanism.

Motion for Protective Order

Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for entry of a standard protective order in this proceeding. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to the Company’s 2016 power cost adjustment mechanism filing.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission’s standard protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.² PacifiCorp expects to receive discovery requests related to this report, including requests for propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, or confidential information regarding contracts for the purchase or sale of electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

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).

It is also substantially likely that the parties to these proceedings will seek to discover further information held by PacifiCorp, including confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

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

Respectfully submitted this 19th day of July, 2017.

A handwritten signature in black ink, appearing to read 'Matthew McVee', written over a horizontal line.

Matthew McVee
Chief Regulatory Counsel
PacifiCorp d/b/a Pacific Power