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May 3, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
P.O. Box 1088
201 High Street SE, Suite 100
Salem, Oregon 97301

**Re: Docket No. UE 336 – Idaho Power Company's 2017 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.

Sincerely,

Alisha Till
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 336

In the Matter of
IDAHO POWER COMPANY
2017 Annual Power Supply Expense
True-Up.

**MOTION FOR PROTECTIVE ORDER
EXPEDITED CONSIDERATION
REQUESTED**

1 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company (“Idaho
2 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s
3 (“Commission”) general 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 filed 2017 Annual Power Supply Expense True-Up. Because Idaho
6 Power will be responding to Staff’s Data Requests today, Idaho Power requests that the
7 general protective order be entered on an expedited basis.

8 In support of this Motion, the Company states:

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

17 2. On February 23, 2018, Idaho Power filed its 2017 Annual Power Supply Expense
18 True-Up. Discovery is ongoing. Certain documents responsive to data requests may contain

1 confidential material, including but not limited to proprietary cost data and models,
2 commercially sensitive load and resource projections, confidential market analyses and
3 business projections, and confidential information regarding contracts for the purchase or sale
4 of electric power, power services, or fuel. Public disclosure of the confidential information
5 would be detrimental to Idaho Power and its customers.

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

DATED: May 3, 2018

McDOWELL RACKNER GIBSON PC


Lisa F. Rackner

IDAHO POWER COMPANY

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