



825 NE Multnomah, Suite 2000
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January 15, 2013

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

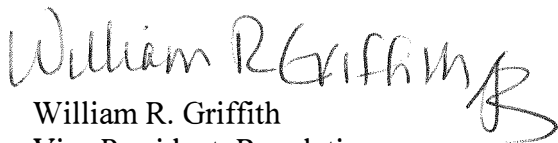
Attn: Filing Center

**RE: UM 1633 – Motion for Protective Order
Expedited Consideration Requested**

PacifiCorp d/b/a Pacific Power (Company) submits for filing a Motion for Protective Order in the above-referenced proceeding. The Company requests expedited consideration to accommodate the workshop scheduled on January 23, 2013. As indicated on the attached service list, a copy of this filing is being served to all parties on the service list.

Please direct inquiries to Bryce Dalley, Director of Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,



William R. Griffith
Vice President, Regulation

Enclosure

cc: Service List – UM 1633

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document, in Docket UM 1633, on the date indicated below by email and/or US Mail, addressed to said parties at his or her last-known address(es) indicated below.

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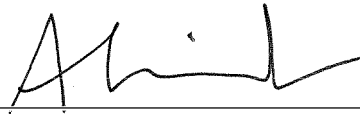
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DATED: January 15, 2013



Amy Eissler
Coordinator, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1633

In the Matter of
PUBLIC UTILITY COMMISSION OF
OREGON

Investigation Into Treatment of Pension
Costs in Utility Rates.

PACIFICORP D/B/A PACIFIC POWER'S
MOTION FOR PROTECTIVE ORDER

**EXPEDITED CONSIDERATION
REQUESTED**

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. The Company requests expedited
4 consideration of this motion because workshops with the parties are scheduled for January 23
5 and 30, 2013. Good cause exists to issue a protective order to protect commercially sensitive
6 and confidential business information related to the Company's pension costs.

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 this protective order to
11 facilitate the communication of information between the parties during informal workshops.

12 It is also substantially likely that the parties to these proceedings will seek to discover
13 further information held by PacifiCorp and the other utilities participating in this docket,

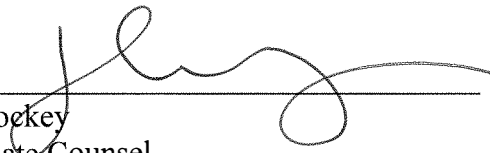
¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing Telecommunication 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 including confidential business information. Issuance of a protective order will facilitate the
2 production of relevant information and expedite the discovery process.

3 For these reasons, PacifiCorp respectfully requests that the Commission enter its
4 standard protective order in this docket. The Company requests expedited consideration of
5 this motion to allow parties who execute the protective order to discuss confidential
6 information during the upcoming workshops and to obtain prompt responses to discovery
7 requests.

Respectfully submitted this 15th day of January, 2013.



Etta Logkey
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PacifiCorp d/b/a Pacific Power

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Senior Counsel
PacifiCorp d/b/a Pacific Power