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April 8, 2015

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
3930 Fairview Industrial Dr. S.E.  
Salem, OR 97302-1166

Attn: Filing Center

**Re: Docket UM 1662—PacifiCorp's Motion for Protective Order**

PacifiCorp d/b/a Pacific Power submits for filing a motion for protective order in this proceeding.

Please direct any informal inquiries to Natasha Siores, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,

R. Bryce Dalley  
Vice President, Regulation

Enclosures

cc: UM 1662 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1662**

In the Matter of

PORTLAND GENERAL ELECTRIC AND  
PACIFICORP D/B/A PACIFIC POWER

Request for Generic Power Cost Adjustment  
Mechanism Investigation.

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.

6           The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on  
7 discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission’s  
8 standard protective order is designed to allow the broadest possible discovery consistent with  
9 the need to protect confidential information.<sup>2</sup> PacifiCorp expects to receive discovery  
10 requests related to this report, including requests for propriety cost data and models,  
11 commercially sensitive pricing information, confidential market analyses and business  
12 projections, or confidential information regarding contracts for the purchase or sale of

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<sup>1</sup> 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”).

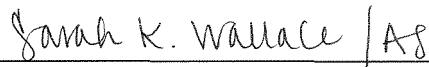
<sup>2</sup> OAR 860-001-0080(2).

1 electric power, power services, or fuel. The Company will be exposed to competitive injury  
2 if it is forced to make unrestricted disclosure of its confidential business information.

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

7 For these reasons, PacifiCorp respectfully requests that the Commission enter its  
8 standard protective order in this docket. The Company requests expedited consideration of  
9 this motion to allow parties who execute the protective order to obtain prompt responses to  
10 discovery requests.

Respectfully submitted this 8<sup>th</sup> day of April, 2015.

 Sarah K. Wallace / AS

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Sarah K. Wallace  
Assistant General Counsel  
Pacific Power