

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM - _____

In the Matter of
Noble Americas Energy Solutions LLC's
2013 RPS Report

**NOBLE AMERICAS ENERGY
SOLUTIONS LLC'S MOTION FOR
A GENERAL PROTECTIVE ORDER
*EXPEDITED CONSIDERATION
REQUESTED***

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), Noble Americas Energy
2 Solutions LLC ("Noble Solutions") moves the Public Utility Commission of Oregon
3 (Commission) for entry of a general protective order in these proceedings. Noble
4 Solutions filed its 2013 RPS Report on May 30, 2014. The filing included
5 confidential information. Noble Solutions requests expedited consideration of this
6 motion in order to promptly provide to parties the confidential information in the
7 initial filing. Good cause exists to issue a protective order to protect commercially
8 sensitive and confidential business information related to Noble Solutions' Filing.
9 The Commission's rules authorize Noble Solutions to seek reasonable
10 restrictions on discovery of trade secrets and other confidential business information.¹
11 The Commission's general protective order is designed to allow the broadest possible
12 discovery consistent with the need to protect confidential information.² Noble
13 Solutions' initial filing in this case contains commercially sensitive pricing

¹See 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 communications of information between litigants").

²OAR 860-001-0080(2)

1 information, load information, and confidential information regarding contracts for
2 the purchase of RECs. Noble Solutions will be exposed to competitive injury if it is
3 forced to make unrestricted disclosure of its confidential business information.

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

8 For these reasons, Noble Solutions respectfully requests that the Commission
9 enter its general protective order in this docket. Noble Solutions requests expedited
10 consideration of this motion to allow parties who execute the protective order to
11 promptly obtain the confidential information in the initial filing and responses to
12 discovery requests.

DATED: June 3, 2014



Greg Bass
Director – Regulatory
Noble Americas Energy Solutions LLC