



April 13, 2016

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, OR 97308-1088

Re: UM 1716 - In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation to Determine the Resource Value of Solar

Attached for filing in the above-referenced docket is Idaho Power Company's Motion for Protective Order.

Please contact this office with any questions.

Wendy McIndoo

Very truly yours,

Wendy McIndoo Office Manager

Attachments

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2	UM 1716	
3	In the Matter of	MOTION FOR PROTECTIVE ORDER
4 5	PUBLIC UTILITY COMMISSION OF OREGON,	EXPEDITED CONSIDERATION
6	Investigation to Determine the Resource Value of Solar.	REQUESTED
7		
8	Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho	
9	Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's	
10	("Commission") general protective order in this proceeding. Good cause exists to issue a	
11	Protective Order to protect the Company's commercially sensitive and confidential business	
12	information produced in this docket. Because of the expedited timeline for responding to	
13	Staff's Data Requests, Idaho Power requests that the general protective order be entered on	
14	an expedited basis.	
15	In support of this Motion, the Company states:	
16	The Commission's rules authority	orize Idaho Power to seek reasonable restrictions
17	on discovery of trade secrets and other confidential business information. See 860-001-0080;	
18	ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other	
19	confidential research, development, or commercial information"); see also In re Investigation	
20	into the Cost of Providing Telecommunication Service, Docket UM 351, Order No. 91-500	
21	(1991) (recognizing that protective orders are a reasonable means to protect "the rights of a	
22	party to trade secrets and other confidential commercial information" and "to facilitate the	
23	communication of information between litigants").	
24		Power filed its Petition to Intervene in this docket.
25	•	ated to the filing will contain confidential material,
26	The expected that contain accuments for	

1	including but not limited to proprietary cost data and models, commercially sensitive load and	
2	resource projections, confidential market analyses and business projections, and confidential	
3	information regarding contracts for the purchase or sale of electric power, power services, or	
4	fuel. Public disclosure of the confidential information could be detrimental to Idaho Power and	
5	its customers.	
6	3. It is substantially likely that Staff and others in this proceeding will seek to	
7	discover confidential business information. "The Commission's standard blanket protective	
8	order is designed to facilitate discovery in cases involving discovery of large numbers of	
9	documents." See In re Portland Extended Area Service Region, Docket UM 261, Order No.	
10	91-958 (1991). Issuance of a protective order will facilitate the production of relevant	
11	information and expedite the discovery process.	
12	For the foregoing reasons, Idaho Power requests entry of a standard Protective Order	
13	in this docket.	
14 15	DATED: April 13, 2016. McDowell RACKNER & GIBSON PC	
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