

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM - _____

In the Matter of

Noble Americas Energy Solutions LLC's

2014 RPS Report

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

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 2014 RPS Report on May 22, 2015. The filing included
5 confidential information. Good cause exists to issue a protective order to protect
6 commercially sensitive and confidential business information related to Noble
7 Solutions' Filing.

8 The Commission's rules authorize Noble Solutions to seek reasonable
9 restrictions on discovery of trade secrets and other confidential business information.¹
10 The Commission's general protective order is designed to allow the broadest possible
11 discovery consistent with the need to protect confidential information.² Noble
12 Solutions' initial filing in this case contains commercially sensitive pricing
13 information, load information, and confidential information regarding contracts for

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").

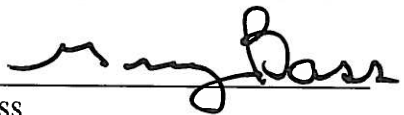
²OAR 860-001-0080(2)

14 the purchase of RECs. Noble Solutions will be exposed to competitive injury if it is
1 forced to make unrestricted disclosure of its confidential business information.

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

6 For these reasons, Noble Solutions respectfully requests that the Commission
7 enter its general protective order in this docket.

DATED: May 22, 2015


Greg Bass
Director – Regulatory
Noble Americas Energy Solutions LLC