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May 27, 2015

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: Docket UM 1736

Attention Filing Center:

Iberdrola Renewables, LLC submits for its Renewable Portfolio Standard Oregon Compliance Report for 2014 and a Motion for Protective Order.

Please note that portions of the report are CONFIDENTIAL, containing commercially sensitive and confidential business information and are provided under seal pursuant to OAR 860-001-0070.

Please contact this office or the individuals listed in the application with any questions.

Very truly yours,

Katherine McDowell

Enclosures

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
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3	UM 1736	
4	In the Matter of	MOTION FOR PROTECTIVE OPPER
5	IBERDROLA RENEWABLES, LLC	MOTION FOR PROTECTIVE ORDER
6	2014 Renewable Portfolio Standard Compliance Report	
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8	Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Iberdrola Renewables, LLC	
10	("Iberdrola" or "Company") moves the Public Utility Commission of Oregon ("Commission") for	
11	entry of standard protective order in this proceeding. Good cause exists to issue a Protective	
12	Order to protect commercially sensitive and confidential business information related to the	
13	Company's filed 2014 Renewable Portfolio Standard Compliance Report (RPS).	
14	In support of this Motion, the Company states:	
15	1. The Commission's rules auth	orize Iberdrola to seek reasonable restrictions on
16	discovery of trade secrets and other confidential business information. See 860-001-0080;	
17	ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other	
18	confidential research, development, or commercial information"); see also In re Investigation	
19	into the Cost of Providing Telecommunication Service, Docket UM 351, Order No. 91-500	
20	(1991) (recognizing that protective orders are a reasonable means to protect "the rights of a	
21	party to trade secrets and other confidential commercial information" and "to facilitate the	
22	communication of information between litigants").	
23	2. Concurrently with this motion	n, Iberdrola is filing its 2014 Renewable Portfolio
24	Standard Compliance Report. The	report contains confidential material, including

commercially sensitive customer load and power pricing information. Public disclosure of the

confidential information could be detrimental to Iberdrola and its customers.

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1	3. Issuance of a protective of	order will facilitate the production of relevant information
2	and expedite the discovery process.	See In re Portland Extended Area Service Region,
3	Docket UM 261, Order No. 91-958 (1991)	
4	For the foregoing reasons, Iberdrola requests entry of a standard Protective Order in	
5	this docket.	
6	DATED: May 27, 2015.	McDowell Rackner & Gibson PC
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