



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

October 26, 2015

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-1166

Attn: Filing Center

**RE: UM 1742 —PacifiCorp's Unopposed Motion for General Protective Order –  
*Expedited Consideration Requested***

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Unopposed Motion for General Protective Order - Expedited Consideration Requested.

If you have questions about this filing, please contact Erin Apperson, Manager of Regulatory Affairs, at (503) 813-6642.

Sincerely,

R. Bryce Dalley  
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1742**

SURPRISE VALLEY ELECTRIFICATION  
CORP.,

Complainant

v.

PACIFICORP d/b/a PACIFIC POWER,

Respondent.

PACIFICORP’S UNOPPOSED  
MOTION FOR GENERAL  
PROTECTIVE ORDER

*EXPEDITED CONSIDERATION  
REQUESTED*

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2 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power  
3 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for  
4 entry of a standard protective order in this proceeding. The Company requests expedited  
5 consideration of this motion to allow for the exchange of discovery on Monday, October 26,  
6 2015, or as soon as possible thereafter. PacifiCorp has conferred with Complainant, and  
7 Complainant does not object to this motion.

8 The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on  
9 discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission’s  
10 standard protective order is designed to allow the broadest possible discovery consistent with  
11 the need to protect confidential information.<sup>2</sup> PacifiCorp requests this protective order to

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<sup>1</sup> See OAR 860-001-0000(1) (adopting the ORCP); 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 trade secrets and other confidential commercial information and “to facilitate the communication of information between litigants”).

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

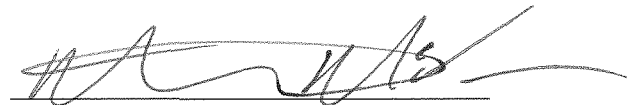
1 facilitate the communication of information between the parties and expedite the discovery  
2 process.

3           It is expected that certain documents related to the Complaint will contain  
4 confidential information, including but not limited to commercially sensitive load and  
5 resource projections, confidential market analyses and business projections, and confidential  
6 information regarding contracts for the purchase or sale of electric power. Furthermore, it is  
7 substantially likely that the staff and other parties to this proceeding will seek to discover  
8 confidential business information. Public disclosure of the confidential information could be  
9 detrimental to the Complainant, PacifiCorp and their respective customers. Accordingly,  
10 good cause exists to issue a protective order to protect commercially sensitive and  
11 confidential business information.

12           For these reasons, PacifiCorp respectfully requests that the Commission enter its  
13 standard protective order in this docket.

Respectfully submitted this 26<sup>th</sup> day of October 2015.

By:



Matthew D. McVee  
Assistant General Counsel  
PacifiCorp d/b/a Pacific Power