

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM - \_\_\_\_\_

In the Matter of  
Noble Americas Energy Solutions LLC's  
2015 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 2015 RPS Report on \_\_\_\_\_, 2016. 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.<sup>1</sup>  
10          The Commission's general protective order is designed to allow the broadest possible  
11          discovery consistent with the need to protect confidential information.<sup>2</sup> Noble  
12          Solutions' initial filing in this case contains commercially sensitive pricing  
13          information, load information, and confidential information regarding contracts for

<sup>1</sup>See 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").

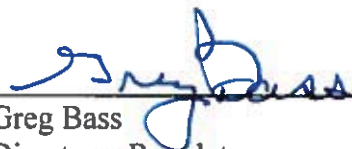
<sup>2</sup>OAR 860-001-0080(2)

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 31, 2016

  
Greg Bass  
Director – Regulatory  
Noble Americas Energy Solutions LLC