



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

September 19, 2016

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UM 1794—PacifiCorp's Motion for General Protective Order

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

If you have questions about this filing, please contact Natasha Siores at (503) 813-6583.

Sincerely,

A handwritten signature in black ink that reads "R. Bryce Dalley". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

R. Bryce Dalley
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1794

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Investigation into Schedule 37 – Avoided Cost
Purchases from Qualifying Facilities of 10,000
kW or Less.

**MOTION FOR GENERAL
PROTECTIVE ORDER**

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power
2 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for
3 entry of a general protective order in the Investigation into Schedule 37 – Avoided Cost
4 Purchases from Qualifying Facilities of 10,000 kW or Less proceeding. Good cause exists to
5 issue a Protective Order to protect commercially sensitive and confidential business
6 information in this proceeding.

7 The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on
8 discovery of trade secrets and other confidential business information.¹ The Commission’s
9 general protective order is designed to allow the broadest possible discovery consistent with
10 the need to protect confidential information.² PacifiCorp requests this protective order to
11 facilitate the communication of information between the parties and expedite the discovery
12 process.

¹ 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”).

² OAR 860-001-0080(2).

1 For these reasons, PacifiCorp respectfully requests that the Commission enter its
2 current general protective order in this docket.

Respectfully submitted this 19th day of September 2016.

By: 

Erin Apperson
Legal Counsel
PacifiCorp d/b/a Pacific Power