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November 15, 2016

VIA ELECTRONIC

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

Re:

Docket No. UM 1801 - In the Matter of the Application of IDAHO POWER

COMPANY for Authority to Implement Revised Depreciation Rates for Electric

Plant-in-Service.

Attention Filing Center:

Attached for filing in the above-referenced docket is an electronic copy of Idaho Power Company's Motion for Protective Order. Please contact this office with any questions.

Very truly yours,

Sharon Cooper Legal Assistant

Enclosure

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UM 1801			
3 4 5	In the Matter of IDAHO POWER COMPANY	MOTION FOR PROTECTIVE ORDER		
6 7	Application for Authority to Implement Revised Depreciation Rates for Electric Plant-in Service.			
8				
9	Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idah			
10	Power" or "Company") moves for the entry of the Public Utility Commission of Orego			
11	("Commission") general protective order in this proceeding. Good cause exists to issue			
12	Protective Order to protect commercially sensitive and confidential business information related			
13	to the Company's filed Application for Authority to Implement Revised Depreciation Rates fo			
14	Electric Plant-in Service.			
15	In support of this Motion, the Company states:			
16	The Commission's rules authorize Idaho Power to seek reasonable restrictions discovery of trade secrets and other confidential business information. See 860-001-008			
17				
18	ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other			
19	confidential research, development, or commercial information"); see also In re Inves			
20	into the Cost of Providing Telecommunication Service, Docket UM 351, Order No. 91-5			
21	(1991) (recognizing that protective orders are a reasonable means to protect "the rights of a			
22	party to trade secrets and other confidential commercial information" and "to facilitate the			
23	communication of information between litigants").			
24	2. November 2, 2016, Idaho Pov	ver filed its Application for Authority to Implement		
25	Revised Depreciation Rates for Electric Plant-in Service. It is expected that certain document			
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2	data and models, commercially sensitive load and resource projections, confidential market		
3	analyses and business projections, and confidential information regarding contracts for the		
4	purchase or sale of electric power, power services, or fuel. Public disclosure of the confidential		
5	information could be detrimental to Idaho Power and its customers.		
6	3. It is substantially likely that Staff and others in this proceeding will seek to discover		
7	7 confidential business information. "The Commiss	sion's standard blanket protective order is	
8	designed to facilitate discovery in cases involving discovery of large numbers of documents."		
9	See In re Portland Extended Area Service Region, Docket UM 261, Order No. 91-958 (1991).		
10	Issuance of a protective order will facilitate the production of relevant information and expedite		
11	the discovery process.		
12	For the foregoing reasons, Idaho Power requests entry of a standard Protective Order		
13	3 in this docket.		
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15		ELL RACKNES GIBSON FO	
16	6 Lisa Rad	server s	
17	7		
18	8	OWER COMPANY	
19	144.161	ower Company	
20	1	Idaho Street	
21	Boise, Idaho 83707-0070 Telephone: 208-388-5825 Facsimile: 208-388-6936		
22	•	e: 200-300-0930 Inordstrom@idahopower.com	
23		o for Idoha Dawar Campany	
24	4	s for Idaho Power Company	
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related to the filing will contain confidential material, including but not limited to proprietary cost

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