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VIA ELECTRONIC AND U.S. MAIL

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

Re: Docket UM ____ - Avangrid Renewables, LLC RPS Compliance Report for 2016

Attention Filing Center:

Avangrid Renewables, LLC submits its Renewable Portfolio Standard Oregon Compliance Report for 2016 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 with any questions.

Very truly yours,



Katherine McDowell

Attachments

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM _____**

4 In the Matter of

5 AVANGRID RENEWABLES, LLC

6 2016 Renewable Portfolio Standard
7 Compliance Report

MOTION FOR PROTECTIVE ORDER

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9 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Avangrid Renewables, LLC
10 (“Avangrid” or “Company”) moves the Public Utility Commission of Oregon (“Commission”)
11 for entry of standard protective order in this proceeding. Good cause exists to issue a
12 Protective Order to protect commercially sensitive and confidential business information
13 related to the Company’s filed 2016 Renewable Portfolio Standard Compliance Report
14 (“RPS”).

15 In support of this Motion, the Company states:

16 1. The Commission’s rules authorize Avangrid to seek reasonable restrictions on
17 discovery of trade secrets and other confidential business information. *See* 860-001-0080;
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 Investigation*
20 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
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. Concurrently with this motion, Avangrid is filing its 2016 Renewable Portfolio
25 Standard Compliance Report. The report contains confidential material, including
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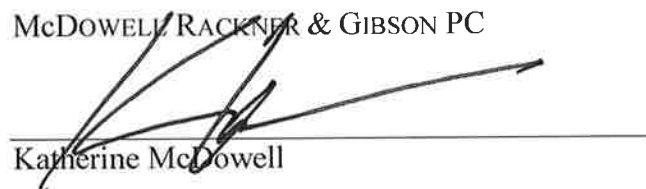
1 commercially sensitive customer load and power pricing information. Public disclosure of the
2 confidential information could be detrimental to Avangrid and its customers.

3 3. Issuance of a protective order will facilitate the production of relevant information
4 and expedite the discovery process. *See In re Portland Extended Area Service Region*, Docket
5 UM 261, Order No. 91-958 (1991).

6 For the foregoing reasons, Avangrid requests entry of a standard Protective Order in
7 this docket.

8 DATED: May 10, 2017.

McDOWELL RACKNER & GIBSON PC

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10 
Katherine McDowell

11 **AVANGRID RENEWABLES, LLC**

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