1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UM 1779			
3				
4	In the Matter of			
5	Shell Energy North America (US), L.P. MOTION FOR PROTECTIVE ORDER			
6	2016 Renewable Portfolio Standard			
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9	Pursuant to ORCP 36(c)(7) and OAR 860-001-0080, Shell Energy North America (US),			
10	L.P. ("Shell Energy" or "Company") moves the Public Utility Commission of Oregon			
11	("Commission") for entry of a standard protective order in this proceeding. Good cause exists to			
12	issue a Protective Order to protect commercially sensitive and confidential business information			
13	related to the Company's filed 2016 Renewable Portfolio Standard Compliance Report ("RPS").			
14	In support of this Motion, the Company states:			
15	1. The Commission's rules authorize Shell Energy to seek reasonable restrictions on			
16	discovery of trade secrets and other confidential business information. See 860-001-0080; ORCP			
17	36(c)(7) (providing protection against unrestricted discovery of "trade secrets or other			
18	confidential research, development, or commercial information"); see also In re Investigation into			
19	the Cost of Providing Telecommunication Service, Docket UM 350, Order No. 91-6500 (1991)			
20	(recognizing that protective orders are a reasonable means to protect "the rights of a party to trade			
21	secrets and other confidential commercial information" and "to facilitate the communication of			
22	information between litigants").			
23	2. Concurrently with this motion, Shell Energy is filing its 2016 Renewable Portfolio			
24	Standard Compliance Report. The report contains confidential material, including commercially			
25	sensitive customer load and power pricing information. Public disclosure of the confidential			
26	information could be detrimental to Shell Energy and its customers.			
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1	3. Issuance of a protective order will facilitate the production of relevant information			
2	and expedite the discovery process. See In re Portland Extended Area Service Region, Docket			
3	UM 261, Order No. 91-958 (1991).			
4	For the foregoing reasons, Shell Energy requests entry of a standard Protective Order in			
5	this docket.			
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7	Dated: May	y 30, 2017	Shell Energy North America (US), L.P.	
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