

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

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

In the Matter of  
Calpine Energy Solutions, LLC's  
2016 RPS Report

**CALPINE ENERGY  
SOLUTIONS, LLC'S MOTION FOR  
A GENERAL PROTECTIVE ORDER**

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), Calpine Energy Solutions,  
2 LLC ("Calpine Solutions") moves the Public Utility Commission of Oregon  
3 (Commission) for entry of a general protective order in these proceedings. Calpine  
4 Solutions filed its 2016 RPS Report on \_\_\_\_\_, 2017. 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 Calpine  
7 Solutions' Filing.

8 The Commission's rules authorize Calpine 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> Calpine  
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").

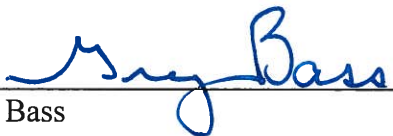
<sup>2</sup>OAR 860-001-0080(2)

14 the purchase of RECs. Calpine 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 Calpine 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, Calpine Solutions respectfully requests that the  
7 Commission enter its general protective order in this docket.

DATED: May 30, 2017

  
\_\_\_\_\_  
Greg Bass  
Director  
Calpine Energy Solutions, LLC