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Portland, Oregon 97232

June 15, 2017

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Attn: Filing Center

**RE: UM 1845– PacifiCorp’s 2017R Request for Proposals–Motion for General Protective Order – Expedited Consideration Requested**

PacifiCorp d/b/a Pacific Power requests the Public Utility Commission of Oregon grant the enclosed motion for a general protective order and requests expedited consideration.

Please direct inquiries to Natasha Siores at (503) 813-6583.

Sincerely,

A handwritten signature in black ink, appearing to read "Etta Lockey", with a long, sweeping horizontal line extending to the right.

Etta Lockey  
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1845**

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER's,  
Application for Approval of 2017R Request for  
Proposals.

MOTION FOR GENERAL  
PROTECTIVE ORDER

*Expedited Consideration Requested*

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power  
2 (PacifiCorp) moves the Public Utility Commission of Oregon (Commission) for entry of a  
3 general protective order in this proceeding. On June 1, 2017, PacifiCorp filed an application  
4 asking the Commission to open a docket for approval of a solicitation process for new wind  
5 resources and appoint an independent evaluator to oversee the request for proposal (RFP)  
6 process. Good cause exists to issue a general protective order to protect commercially  
7 sensitive and confidential business information related to PacifiCorp's 2017R RFP.  
8 PacifiCorp requests expedited consideration of this motion to facilitate the disclosure of  
9 confidential information related to independent evaluator bids to Commission Staff.

10 The Commission's rules authorize PacifiCorp to seek reasonable restrictions on  
11 discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission's  
12 general protective order is designed to allow the broadest possible discovery consistent with

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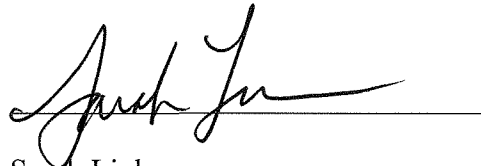
<sup>1</sup> See OAR 860-001-0000(1) (adopting the ORCP); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing Telecommunication Service*, 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").

1 the need to protect confidential information.<sup>2</sup> PacifiCorp anticipates that discovery in this  
2 proceeding may include RFP-related information covered by confidentiality agreements,  
3 proprietary cost data and models, commercially-sensitive load and resource projections, and  
4 confidential market and pricing analyses. PacifiCorp will be exposed to competitive injury if  
5 it is forced to make unrestricted disclosure of its confidential business information. Issuance  
6 of a protective order will facilitate the production of relevant information and expedite the  
7 discovery process.

8 For these reasons, PacifiCorp respectfully requests that the Commission enter its  
9 general protective order in this docket. PacifiCorp requests expedited consideration of this  
10 motion to allow for the disclosure of confidential materials related to selection of the  
11 independent evaluator.

Respectfully submitted this 15<sup>th</sup> day of June 2017.

By:



Sarah Link  
Vice President & General Counsel  
PacifiCorp d/b/a Pacific Power

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