

December 20, 2017

***VIA ELECTRONIC FILING***

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

Attn: Filing Center

**Re: UM \_\_\_\_ – PacifiCorp 2019-2023 Oregon Renewable Portfolio Standard  
Implementation Plan – Motion for Protective Order – Expedited Consideration  
Requested**

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for General Protective Order. The entry of a general protective order will prevent delay in providing availability of confidential information when PacifiCorp will file its 2019-2023 Oregon Renewable Portfolio Standard Implementation Plan on or before December 29, 2017, in compliance with ORS 469A.075 and OAR 860-083-0400.

Please contact me with any informal correspondence or questions regarding this filing at (503) 813-6583.

Sincerely,



Natasha Siores  
Manager, Regulatory Affairs

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM \_\_\_\_\_

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER  
Resource Value of Solar

MOTION FOR GENERAL  
PROTECTIVE ORDER  
**EXPEDITED TREATMENT  
REQUESTED**

Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power moves the Public Utility Commission of Oregon (Commission) for entry of a general protective order in this proceeding. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to PacifiCorp’s procurement of resources necessary to comply with Oregon’s renewable portfolio standard (RPS).

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission’s general protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.<sup>2</sup> PacifiCorp expects to receive discovery requests in these proceedings, including requests for propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, or confidential information regarding contracts for the purchase or sale of

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<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 communication of information between litigants”).

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

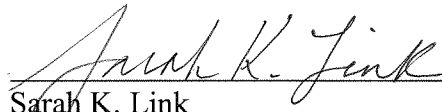
electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

It is also substantially likely that the parties to these proceedings will seek to discover further information held by PacifiCorp, including confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

PacifiCorp seeks expedited treatment of this motion to prevent any delay in providing availability of confidential information when the company provides its 2019-2023 Oregon Renewable Portfolio Standard Implement Plan in this docket on or before December 29, 2017.

For these reasons, PacifiCorp respectfully requests that the Commission enter its general protective order in this docket.

Respectfully submitted this 20<sup>th</sup> day of December, 2017.

  
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Sarah K. Link  
Vice President and General Counsel  
PacifiCorp d/b/a Pacific Power