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June 29, 2015

Public Utility Commission of Oregon
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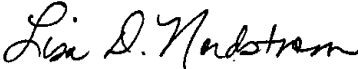
RE: UP 327 – In the Matter the Application of Idaho Power Company for an Order
Authorizing Approval of the Purchase from PacifiCorp of a Longwall Mining System
Motion for Protective Order

Attention Filing Center:

Attached for filing is an electronic copy of Idaho Power Company's Motion for Protective Order in the above-referenced matter.

Please contact this office with any questions.

Very truly yours,



Lisa D. Nordstrom

LDN/kkt

Enclosures

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

3 **UP 327**

4 In the Matter of the Application of Idaho
5 Power Company for an Order Authorizing
6 Approval of the Purchase from PacifiCorp
of a Longwall Mining System.

MOTION FOR PROTECTIVE ORDER

7 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho
8 Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's
9 ("Commission") general protective order in this proceeding. Good cause exists to issue a
10 Protective Order to protect commercially sensitive and confidential business information that is
11 considered to be of a trade secret, privileged or confidential nature.

12 In support of this Motion, the Company states:

13 1. The Commission's rules authorize reasonable restrictions on discovery of trade
14 secrets and other confidential business information. See 860-001-0080; ORCP 36(C)(7)
15 (providing protection against unrestricted discovery of "trade secrets or other confidential
16 research, development, or commercial information"). See also *In re Investigation into the Cost*
17 *of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991)
18 (recognizing that protective orders are a reasonable means to protect "the rights of a party to
19 trade secrets and other confidential commercial information" and "to facilitate the
20 communication of information between litigants").

21 2. On June 19, 2015, Idaho Power filed an Application of Idaho Power Company for
22 an Order Authorizing Approval of the Purchase from PacifiCorp of a Longwall Mining System.
23 Idaho Power anticipates that discovery in this proceeding will include requests for
24 commercially sensitive and confidential business information. Idaho Power and/or PacifiCorp
25 will be exposed to competitive, operational, and/or regulatory injury if it is forced to make
26 unrestricted disclosure of its confidential business information. "The Commission's standard

1 blanket protective order is designed to facilitate discovery in cases involving discovery of large
2 numbers of documents." See *In re Portland Extended Area Service Region*, Docket UM 261,
3 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of
4 relevant information and expedite the discovery process.

5 For the foregoing reasons, Idaho Power requests entry of a standard Protective Order
6 in this docket.

7 DATED: June 29, 2015

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10 Lisa D. Nordstrom
11 Lead Counsel for Idaho Power Company
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