



Please Reply To:

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July 26, 2006

*Via Electronic Filing*

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

RE: PacifiCorp's Motion for Standard Protective Order and Petition to Intervene  
UM 1188

Enclosed for filing are PacifiCorp's Motion for Standard Protective Order and Petition to Intervene in the above-referenced matter. A copy of this filing was served on all parties to this proceeding as indicated on the attached certificate of service.

Sincerely,

A handwritten signature in cursive script that reads "Natalie Hocken".

Natalie L. Hocken

Enclosure

cc: Service List for UM 1188

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1188**

In the Matter of	)	
PUBLIC UTILITY COMMISSION	)	Petition to Intervene of PacifiCorp
OF OREGON Staff Investigation	)	
Into Advanced Metering	)	

Pursuant to ORS 756.525 and OAR 860-012-0001, PacifiCorp respectfully petitions to intervene in this proceeding. In support of this petition, PacifiCorp states:

1. PacifiCorp is an electric public utility in the state of Oregon and is subject to the jurisdiction of the Public Utility Commission of Oregon (the “Commission”).

2. The name and address of PacifiCorp are:

PacifiCorp  
825 NE Multnomah Street  
Portland, OR 97232

Communications concerning this proceeding should be addressed to:

Laura Beane  
Manager, Regulatory  
PacifiCorp  
825 NE Multnomah, Suite 2000  
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3. PacifiCorp has an active interest in this proceeding and PacifiCorp’s participation in the proceeding will not unreasonably broaden the issues, burden the record or unreasonably delay the proceedings.

Wherefore, PacifiCorp respectfully requests that the Commission grant this petition to intervene.

DATED: July 26, 2006.

A handwritten signature in cursive script, reading "Natalie L. Hocken".

Natalie L. Hocken, OSB 94409  
Assistant General Counsel  
PacifiCorp

Counsel for PacifiCorp

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1188**

In the Matter of	)	
PUBLIC UTILITY COMMISSION	)	PacifiCorp's Motion for Standard
OF OREGON	)	Protective Order
Staff Investigation into	)	
Advanced Metering	)	
	)	

Pursuant to OAR 860-012-0035(1)(k), PacifiCorp moves for entry of the Commission's standard protective order in this proceeding. PacifiCorp believes good cause exists for issuance of such an order to protect confidential and proprietary business information. Concurrent with the filing of this motion, PacifiCorp filed a petition to intervene in this proceeding. PacifiCorp's motion for the standard protective order is contingent upon its petition for intervention being granted in this proceeding.

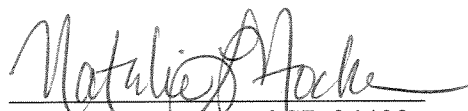
In support of this motion, PacifiCorp states:

1. The Commission's rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information. *See* OAR 860-11-000(3) (adopting Oregon Rules of Civil Procedure ("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 (VA/I 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").

2. PacifiCorp anticipates that discovery in this proceeding may include propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, confidential third-party information, or confidential information regarding bids and contract evaluations. Moreover, PacifiCorp has confidentiality obligations to potential bidders in the request for proposal process with which it must comply. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential and proprietary business information at this time. Issuance of a protective order will facilitate the production of relevant information.

For the foregoing reasons, PacifiCorp respectfully requests entry of the Commission's standard protective order in this docket once PacifiCorp's petition for intervention has been granted.

DATED: July 26, 2006.



Natalie E. Hoeken, OSB 94409  
Assistant General Counsel  
PacifiCorp

Counsel for PacifiCorp