

November 16, 2006

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

PUC Filing Center
Public Utility Commission of Oregon
P0 Box 2148
Salem, OR 97308-2148

RE: PacifiCorp's Motion for Standard Protective Order
UI 255

Enclosed for filing is PacifiCorp's Motion for Standard Protective Order 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,


Natalie L. Hocken

cc: Service List for UI 255

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UI 255

In the Matter of the Application of
PACIFICORP Requesting Approval to
Purchase Firm Transportation Service
From Kern River Gas Transmission
Company

PacifiCorp's Motion for Standard
Protective Order

Pursuant to OAR 860-012-0035(1)(k), PacifiCorp moves for entry of the Commission's standard protective order in this proceeding. As good cause for 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").

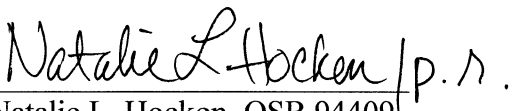
2. PacifiCorp anticipates that discovery in this proceeding may include commercially sensitive pricing information, confidential market analyses and business projections, or confidential information regarding contracts for the purchase or sale of

transportation services. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

3. Staff has already sought to discover information held by PacifiCorp, including confidential business information. “The Commission’s standard blanket protective order is designed to facilitate discovery in cases involving discovery of large numbers of documents.” *See In re Portland Extended Area Service Region (UM26I)*, Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

For the foregoing reasons, PacifiCorp requests entry of the Commission’s standard protective order in this docket.

DATED: November 16, 2006.

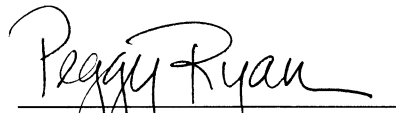

Natalie L. Hocken, OSB 94409
Assistant General Counsel
PacifiCorp

Counsel for PacifiCorp

CERTIFICATE OF SERVICE

I certify that I have on November 16, 2006 served the foregoing document in Docket No. UI 255 upon all parties of record in this proceeding by mailing a copy with first class postage prepaid and by electronic mail to the following person(s) at his or her last-known address(es) as indicated below and via email to said person(s) email address as indicated below:

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Peggy Ryan

Supervisor, Regulatory Administration