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December 26, 2012

VIA EMAIL AND U.S. MAIL

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

Re: Docket UM 1464 (3)

Attention Filing Center:

Attached for filing are the original and one copy of Idaho Power Company's Motion for Protective Order in the above Docket. This motion is being filed concurrently to the Application for Deferred Accounting of Net Variable Power Cost Variances.

A copy of this filing has been served on the parties to the UE 233 service list as indicated on the attached Certificate of Service.

Please contact me if you have any questions.

Very truly yours,
Wendy McIndoo

Wendy McIndoo Office Manager

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UM 1464(3) 3 In the Matter of Idaho Power Company's MOTION FOR PROTECTIVE ORDER Application for Deferred Accounting of Net 4 Variable Power Cost Variances. 5 6 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho 7 Power") moves for the entry of the Public Utility Commission of Oregon's ("Commission") 8 general protective order in this proceeding. Good cause exists to issue a Protective Order to 9 protect commercially sensitive and confidential business information related to the Company's 10 filed Application for Deferred Accounting of Net Variable Power Cost Variances. 11 In support of this Motion, the Company states: 12 The Commission's rules authorize Idaho Power to seek reasonable restrictions 13 14 15 16

- on discovery of trade secrets and other confidential business information. See 860-001-0080; 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").
- On December 26, 2012, Idaho Power filed its Application for Deferred Accounting 2. of Net Variable Power Cost Variances. An attachment to the application contains confidential information and it is possible that additional documents related to the filing will contain confidential material, including but not limited to proprietary cost data and models, commercially sensitive load and resource projections, confidential market analyses and business projections, and confidential information regarding contracts for the purchase or sale

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1	of electric power, power services, or fuel. Public disclosure of the confidential information		
2	could be detrimental to Idaho Power and its customers.		
3	3. It is likely that Staff and others in this proceeding will seek to discover confidential		
4	business information. "The Commission's standard blanket protective order is designed to		
5	facilitate discovery in cases involving discovery of large numbers of documents." See In re		
6	Portland Extended Area Service Region, Docket UM 261, Order No. 91-958 (1991). Issuance		
7	of a protective order will facilitate the production of relevant information and expedite the		
8	discovery process.		
9	For the foregoing reasons, Idaho Power requests entry of a standard Protective Order		
10	in this docket.		
11	DATED: December 26, 2012. McDowell Rackmer & Gibson PC		
12	DATED: Beschilder 29, 23 . 2.		
13	July Journey		
14	Lisa F. Rackner Adam Lowney		
15	IDAHO POWER COMPANY		
16	Lisa Nordstrom		
17	Idaho Power Company P.O. Box 70 1221 W. Idaho Street		
18	Boise, Idaho 83707-0070		
19	Telephone: 208-388-5825 Facsimile: 208-388-6936		
20	E-mail: Inordstrom@idahopower.com		
21	Attorneys for Idaho Power Company		
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1	CERTIFICATE	OF SERVICE	
2	I hereby certify that I served a true and correct copy of Idaho Power's Motion for		
3	General Protective Order in Docket UM 1464(3) to the Parties of record in Docket UE 233		
4	on the following named person(s) on the date indicated below by email addressed to said		
5	person(s) at his or her last-known address(es) indicated below.		
6			
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