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June 10, 2014

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

Public Utility Commission of Oregon
3930 Fairview Industrial Dr. SE
Salem, Oregon 97302-1166

Attn: Filing Center

Re: Docket UM 1694

On May 21, 2014, Loyd Fery Farms, LLC submitted a complaint against PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company) to the Public Utility Commission of Oregon, docketed as UM 1694. The Company hereby submits its answer in response to the complaint.

Please contact Natasha Siores, Director of Regulatory Affairs at (503) 813-6853 for questions on this matter.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosures

Cc: Service List - UM 1694

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of Pacific Power's Answer on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

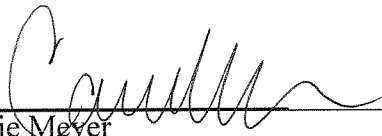
UM 1694

Loyd Fery
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Dated this 10th day of June, 2014.



Carrie Meyer
Supervisor, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1694

Loyd Fery Farms, LLC, Complainant
vs.
PacifiCorp d/b/a Pacific Power, Respondent.

Motion for Protective Order by PacifiCorp
d/b/a Pacific Power

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power
2 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for
3 entry of a standard protective order in this proceeding. Good cause exists to issue a
4 protective order to protect commercially sensitive and confidential business information
5 related to the customer information, including facility design and generational output of the
6 Loyd Fery Farms, LLC qualifying facility project.

7 The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on
8 discovery of trade secrets and other confidential business information.¹ The Commission’s
9 standard protective order is designed to allow the broadest possible discovery consistent with
10 the need to protect confidential information.² PacifiCorp expects to receive discovery
11 requests in this proceedings including confidential information regarding contracts for the
12 purchase or sale of electric power, power services, or fuel. PacifiCorp will be exposed to
13 competitive injury if it is forced to make unrestricted disclosure of its confidential business
14 information.

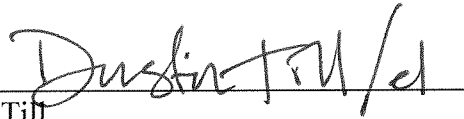
¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information”). See also *In re Investigation into the Cost of Providing Telecommunication 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”).

² OAR 860-001-0080(2).

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

5 For these reasons, PacifiCorp respectfully requests that the Commission enter its
6 standard protective order in this docket. The Company requests expedited consideration of
7 this motion to allow parties who execute the protective order to obtain prompt responses to
8 discovery requests.

Respectfully submitted this 10th day of June, 2014.

A handwritten signature in black ink, appearing to read "Dustin Till", written over a horizontal line.

Dustin Till
Senior Counsel
PacifiCorp d/b/a Pacific Power