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April 12, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97301

Attn: Filing Center

RE: Docket UM 1729—Motion for General Protective Order – Expedited Consideration Requested

PacifiCorp d/b/a Pacific Power submits in the above-referenced docket its Motion for General Protective Order – Expedited Consideration Requested.

Please direct any informal inquiries to Erin Apperson, Manager, Regulatory Affairs, at (503) 813-6642.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1729

In the Matter of
PACIFICORP d/b/a PACIFIC POWER's
Application to Update Schedule 37 Qualifying
Facility Information.

**EXPEDITED MOTION FOR
GENERAL PROTECTIVE ORDER
Expedited Consideration Requested**

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 general protective order in the Company's Application to Update Schedule 37
4 Qualifying Facility Information proceeding. Good cause exists to issue a Protective Order to
5 protect commercially sensitive and confidential business information in this proceeding.

6 The Commission's rules authorize PacifiCorp to seek reasonable restrictions on
7 discovery of trade secrets and other confidential business information.¹ The Commission's
8 general protective order is designed to allow the broadest possible discovery consistent with
9 the need to protect confidential information.² PacifiCorp requests this protective order to
10 facilitate the communication of information between the parties and expedite the discovery
11 process.

¹ See OAR 860-001-0000(1) (adopting the 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*, Docket UM 351, Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect trade secrets and other confidential commercial information and "to facilitate the communication of information between litigants").

² OAR 860-001-0080(2).

1 PacifiCorp requests expedited treatment of this motion to facilitate distribution of
2 confidential information at a settlement meeting with staff and stakeholders scheduled on
3 April 14, 2016.

4 For these reasons, PacifiCorp respectfully requests that the Commission enter its
5 current general protective order in this docket.

Respectfully submitted this 12th day of April 2016.

By: 

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