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December 29, 2016

**VIA ELECTRONIC**

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 1088  
Salem, OR 97308-1088

**Re: Docket No. UE 314 - In the Matter of the Application of IDAHO POWER COMPANY  
2017 Annual Power Cost Update.**

Attention Filing Center:

Attached for filing in the above-referenced docket is an electronic copy of Idaho Power Company's Motion for Protective Order. Please contact this office with any questions.

Very truly yours,

Wendy McIndoo  
Office Manager

Attachment

1                                   **BEFORE THE PUBLIC UTILITY COMMISSION**  
2                                   **OF OREGON**

3                                   **UE 314**

4           In the Matter of

5           **IDAHO POWER COMPANY**

6           2017 Annual Power Cost Update.

**MOTION FOR PROTECTIVE ORDER**

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8           Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho  
9           Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's  
10          ("Commission") general protective order in this proceeding. Good cause exists to issue a  
11          Protective Order to protect commercially sensitive and confidential business information  
12          related to the Company's filed 2017 Annual Power Cost Update.

13           In support of this Motion, the Company states:

14           1.    The Commission's rules authorize Idaho Power to seek reasonable restrictions  
15           on discovery of trade secrets and other confidential business information. See 860-001-0080;  
16           ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other  
17           confidential research, development, or commercial information"); see also *In re Investigation*  
18           *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500  
19           (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a  
20           party to trade secrets and other confidential commercial information" and "to facilitate the  
21           communication of information between litigants").

22           2.    On October 28, 2016, Idaho Power filed its 2017 Annual Power Cost Update. It  
23           is expected that certain documents related to the filing will contain confidential material,  
24           including but not limited to proprietary cost data and models, commercially sensitive load and  
25           resource projections, confidential market analyses and business projections, and confidential  
26           information regarding contracts for the purchase or sale of electric power, power services, or

1 fuel. Public disclosure of the confidential information could be detrimental to Idaho Power and  
2 its customers.

3 3. It is substantially likely that Staff and others in this proceeding will seek to discover  
4 confidential business information. "The Commission's standard blanket protective order is  
5 designed to facilitate discovery in cases involving discovery of large numbers of documents."  
6 See *In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).  
7 Issuance of a protective order will facilitate the production of relevant information and expedite  
8 the discovery process.

9 For the foregoing reasons, Idaho Power requests entry of a standard Protective Order  
10 in this docket.

11 DATED: December 29, 2016

McDOWELL RACKNER GIBSON PC



12 Lisa Rackner

13  
14 **IDAHO POWER COMPANY**

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