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Portland, Oregon 97232

November 23, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3389

Attn: Filing Center

RE: UM 1802—PacifiCorp's Motion for General Protective Order

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion for General Protective Order.

If you have questions about this filing, please contact Natasha Siores at (503) 813-6583.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1802

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

INVESTIGATION OF PACIFICORP'S NON-
STANDARD AVOIDED COST PRICING.

MOTION FOR GENERAL
PROTECTIVE ORDER

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 Investigation into PacifiCorp's Non-Standard
4 Avoided Cost Pricing (UM 1802). Good cause exists to issue a protective order to protect
5 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.

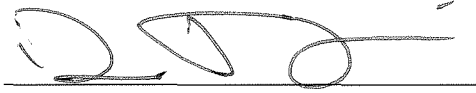
¹ See OAR 860-001-0000(1) (adopting the ORCP); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing Telecommunication Service*, Docket UM 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 For these reasons, PacifiCorp respectfully requests that the Commission enter its
2 current general protective order in this docket.

Respectfully submitted this 23rd day of November 2016.

By:

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

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