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Portland, Oregon 97232

January 6, 2017

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Attn: Filing Center

**RE: UM 1813—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,

A handwritten signature in black ink that reads "R. Bryce Dalley". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

R. Bryce Dalley  
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1813**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

PacifiCorp’s Transportation Electrification  
Public Charging Pilot Program.

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 cost of services and equipment the Company intends to procure through  
6 competitive solicitations.

7           The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on  
8 discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission’s  
9 standard protective order is designed to allow the broadest possible discovery consistent with  
10 the need to protect confidential information.<sup>2</sup> PacifiCorp has received or expects to receive  
11 discovery requests in these proceedings, including requests for propriety cost data and  
12 models, commercially sensitive pricing information, confidential market analyses and  
13 business projections, or confidential information regarding contracts for the purchase or sale

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<sup>1</sup> 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”).

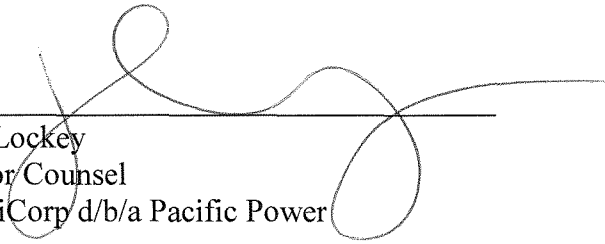
<sup>2</sup> OAR 860-001-0080(2).

1 of electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if  
2 it is forced to make unrestricted disclosure of its confidential business information.

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

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

Respectfully submitted this 6<sup>th</sup> day of January, 2017.



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Etta Lockey  
Senior Counsel  
PacifiCorp d/b/a Pacific Power