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July 27, 2017

VIA EMAIL DELIVERY

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

Re: Docket LC 68 - Idaho Power Company's 2017 Integrated Resource Plan ("IRP")

Attached for filing in the above-identified docket is Idaho Power Company's Motion for Protective Order.

Please contact this office with any questions

Very truly yours,

A handwritten signature in blue ink that reads "Wendy McIndoo".

Wendy McIndoo
Office Manager

Enclosures

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

3 **LC 68**

4 In the Matter

5 IDAHO POWER COMPANY'S

6 2017 Integrated Resource Plan

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 related
12 to the Company's filed 2017 Integrated Resource Plan.

13 In support of this Motion, the Company states:

14 1. The Commission's rules authorize Idaho Power to seek reasonable restrictions on
15 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 June 30, 2017, Idaho Power filed its 2017 Integrated Resource Plan. It is
23 expected that certain documents related to the filing will contain confidential material, including
24 but not limited to proprietary cost data and models, commercially sensitive load and resource
25 projections, confidential market analyses and business projections, and confidential information
26

1 regarding contracts for the purchase or sale of electric power, power services, or fuel. Public
2 disclosure of the confidential information could be detrimental to Idaho Power and 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: July 27, 2017

12 McDOWELL RACKNER GIBSON PC



13
14 Lisa Rackner

15 **IDAHO POWER COMPANY**

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