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May 3, 2018

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
P.O. Box 1088  
201 High Street SE, Suite 100  
Salem, Oregon 97301

**Re: Docket No. UM 1928 – Idaho Power Deferred Accounting of Earnings Related to US Tax Cuts and Jobs Act**

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.

Sincerely,

Alisha Till  
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1928**

In the Matter of  
IDAHO POWER COMPANY  
Deferred Accounting of Earnings Related  
to US Tax Cuts and Jobs Act.

**MOTION FOR PROTECTIVE ORDER  
EXPEDITED CONSIDERATION  
REQUESTED**

1 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company (“Idaho  
2 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s  
3 (“Commission”) general 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 Company’s filed Application for Deferred Accounting. Because Idaho Power will  
6 be responding to Staff’s Data Requests tomorrow, Idaho Power requests that the general  
7 protective order be entered on an expedited basis.

8 In support of this Motion, the Company states:

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

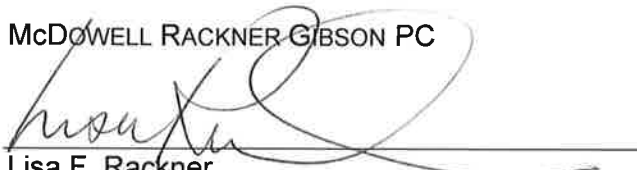
17 2. On December 29, 2017, Idaho Power filed its Application for Deferred Accounting  
18 Related to the US Tax Cuts and Jobs Act. Discovery is ongoing. Certain documents responsive

1 to data requests may contain confidential material, including but not limited to proprietary cost  
2 data and models, commercially sensitive load and resource projections, confidential market  
3 analyses and business projections, and confidential information regarding contracts for the  
4 purchase or sale of electric power, power services, or fuel. Public disclosure of the confidential  
5 information would be detrimental to Idaho Power and its customers.

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

DATED: May 3, 2018

McDOWELL RACKNER GIBSON PC



Lisa F. Rackner

**IDAHO POWER COMPANY**

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