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March 9, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket LC 74 – Idaho Power Company’s 2019 Integrated Resource Plan (“IRP”)

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

Please contact this office with any questions.

Thank you,

A handwritten signature in blue ink that reads "Alisha Till".

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 74

In the Matter of

IDAHO POWER COMPANY'S

2019 Integrated Resource Plan.

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(1), OAR 860-001-0080 and OAR 860-001-0420, Idaho Power
2 Company ("Idaho Power" or "Company") moves for the entry of the Public Utility Commission
3 of Oregon's ("Commission") general protective order in this proceeding. Good cause exists to
4 issue a Protective Order to protect the Company's commercially sensitive and confidential
5 business information produced in this docket.

6 In support of this Motion, the Company states:

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

15 2. On January 31, 2020, Idaho Power filed its Amended 2019 Integrated Resource
16 Plan. Discovery is ongoing. Certain documents responsive to data requests may contain
17 confidential material, including but not limited to proprietary cost data and models, commercially
18 sensitive load and resource projections, confidential market analyses and business projections,
19 and confidential information regarding contracts for the purchase or sale of electric power,

20 power services, or fuel. Public disclosure of the confidential information would be detrimental
21 to Idaho Power and its customers.

22 For the foregoing reasons, Idaho Power requests entry of a General Protective Order
23 in this docket.

DATED: March 9, 2020.

McDOWELL RACKNER GIBSON PC



Lisa F. Rackner

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