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September 16, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 2032 – Investigation into the Treatment of Network Upgrade Costs for Qualifying Facilities

Attention Filing Center:

Attached for filing in the above-captioned docket is Idaho Power Company's Motion for Protective Order, expedited consideration requested.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2032

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Treatment of Network
Upgrade Costs for QFs

MOTION FOR PROTECTIVE ORDER

Expedited Consideration Requested

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

15 2. On January 9, 2020, Idaho Power filed its Petition to Intervene in this case.
16 Discovery is ongoing. Certain documents responsive to data requests may contain confidential
17 material, including but not limited to proprietary cost data and models, commercially sensitive
18 load and resource projections, confidential market analyses and business projections,

19 confidential customer information, and confidential information regarding contracts for the
20 purchase or sale of electric power, power services, or fuel. Public disclosure of the confidential
21 information would be detrimental to Idaho Power and its customers. Idaho Power seeks
22 expedited treatment of this Motion to prevent any delay in the parties' ability to sign the
23 Protective Order and begin reviewing the confidential information.

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

DATED: September 16, 2020.

McDOWELL RACKNER GIBSON PC



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