



ALISHA TILL  
Direct (503) 290-3628  
alisha@mrg-law.com

April 23, 2020

**VIA ELECTRONIC FILING**

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

**Re: Docket No. UE 376 – Idaho Power Company’s 2019 Annual Power Supply  
Expense True-Up.**

Attention Filing Center:

Attached for filing in the above-referenced docket is a copy of Idaho Power Company’s Motion for Protective Order.

Please contact this office with any questions.

Sincerely,

*/s/ Alisha Till*

Alisha Till  
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 376**

In the Matter of

IDAHO POWER COMPANY,

2019 Annual Power Supply Expense True-Up.

**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 February 25, 2020, Idaho Power filed its 2019 Annual Power Supply Expense  
16          True-Up. 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: April 23, 2020.

**McDOWELL RACKNER GIBSON PC**



---

Adam Lowney

IDAHO POWER COMPANY  
Lisa D. Nordstrom  
Lead Counsel  
P.O. Box 70  
Boise, Idaho 83707

Attorneys for Idaho Power Company