



**Oregon
Water Utilities**
A SouthWest Water Company

5391 Running Y Rd.
Klamath Falls, OR 97601
www.swwc.com

September 30, 2020

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: Docket No. UW 183 – Application to Change Rates

Attached for filing in the above-captioned docket is Oregon Water Utilities – Mountain Lakes, Inc.'s Motion for a General Protective Order, expedited consideration requested.

Please contact me at bbahr@swwc.com or (626) 543-2552 with any questions. Thank you.

Sincerely,

/s/ Brian Bahr

Brian Bahr
Director, Regulatory Affairs
SouthWest Water Company

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UW 183

In the Matter of

OREGON WATER UTILITIES – MOUNTAIN
LAKES, INC.

Application for a General Rate Revision.

MOTION FOR PROTECTIVE ORDER

(Expedited Consideration Requested)

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Oregon Water Utilities – Mountain Lakes,
2 Inc. (“OWU”) moves for the entry of the Public Utility Commission of Oregon’s (“Commission”)
3 general protective order in this proceeding. Good cause exists to issue a protective order to
4 protect commercially sensitive and confidential business information related to the OWU’s general
5 rate case. Because OWU has filed its rate case today, OWU requests that the general protective
6 order be entered on an expedited basis.

7 In support of this Motion, OWU states:

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

16 2. On September 30, 2020, OWU filed its application for a general rate case. Certain
17 documents related to the filing include confidential material. Public disclosure of the confidential
18 information could be detrimental to OWU and its customers.

1 3. It is substantially likely that Commission Staff and others in this proceeding will seek
2 to discover confidential business information. "The Commission's standard blanket protective order
3 is designed to facilitate discovery in cases involving discovery of large numbers of documents."
4 *See In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).
5 Issuance of a protective order will facilitate the production of relevant information and expedite the
6 discovery processes.

7 4. OWU requests consideration of this Motion to allow parties who execute the
8 protective order to obtain prompt access to the confidential information that will be submitted in
9 support of the OWU's request for a general rate increase and to expedite discovery in this
10 proceeding.

11 For the foregoing reasons, OWU requests entry of a standard protective order in this
12 docket.

Dated Sept 30, 2020

/s/ Brian D. Bahr

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