



SUZANNE PRINSEN  
Direct (503) 290-3627  
suzanne@mrg-law.com

January 19, 2022

**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 UM 2210 – In the Matter of Idaho Power Company, Application for Waiver of Competitive Bidding Rules.**

Attention Filing Center:

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

Please contact this office with any questions.

Sincerely,

Suzanne Prinsen  
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2210**

In the Matter of  
IDAHO POWER COMPANY  
Application for Waiver of Competitive  
Bidding Rules.

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(1) 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 and customer  
5 information produced in this docket.

6 In support of this Motion, Idaho Power states:

7 1. The Commission’s rules authorize Idaho Power to seek reasonable restrictions  
8 on 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 December 9, 2021, Idaho Power filed its Application for Waiver of Competitive  
16 Bidding Rules (“Application”). Discovery is ongoing. Certain documents responsive to data  
17 requests will contain confidential material, including but not limited to proprietary cost data and  
18 models, commercially sensitive load and resource projections, confidential market analyses  
19 and business projections, confidential customer information, and confidential information

1 regarding contracts for the purchase or sale of electric power, power services, or fuel. Public  
2 disclosure of the confidential information would be detrimental to Idaho Power and its  
3 customers.

4 3. It is substantially likely that Staff and others in this proceeding will seek to  
5 discover confidential business information. "The Commission's standard blanket protective  
6 order is designed to facilitate discovery in cases involving discovery of large numbers of  
7 documents." *See In re Portland Extended Area Service Region*, Docket UM 261, Order No.  
8 91-958 (1991). Issuance of a protective order will facilitate the production of relevant  
9 information and expedite the discovery process.

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

12  
DATED: January 19, 2022

McDOWELL RACKNER GIBSON PC



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Adam Lowney  
McDowell Rackner Gibson PC  
419 SW 11th Avenue, Ste 400  
Portland, Oregon 97205  
Email: dockets@mrg-law.com

**IDAHO POWER COMPANY**

Donovan Walker  
Idaho Power Company  
1221 W. Idaho Street  
P.O. Box 70  
Boise, Idaho 83707-0070  
E-mail: dwalker@idahopower.com  
dockets@idahopower.com

Attorneys for Idaho Power Company