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December 2, 2014

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon
3930 Fairview Industrial Dr. S.E.
Salem, OR 97302-1166

Attn: Filing Center

**RE: Docket LC 62—PacifiCorp's 2015 Integrated Resource Plan
Motion for Protective Order**

PacifiCorp d/b/a Pacific Power (Company) intends to file an Integrated Resource Plan (IRP) on or about March 31, 2015. Prior to filing, the Company intends to provide confidential information to interested parties. Accordingly, the Company requests the Commission grant the enclosed motion for a protective order.

As indicated on the attached service list, a copy of this filing is being served to all parties on the service list for the Company's 2013 IRP.

Please direct inquiries to Natasha Siores, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6583.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosure

cc: Service List—LC 57

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 62

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
2015 Integrated Resource Plan

PACIFICORP’S MOTION FOR A
GENERAL PROTECTIVE ORDER

*EXPEDITED CONSIDERATION
REQUESTED*

Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for entry of a standard protective order in this proceeding. The Company will file its 2015 Integrated Resource Plan (“IRP”) on or about March 31, 2015. The Company requests expedited consideration of this motion to facilitate IRP workshops scheduled for December 8 and 10, 2014 where confidential information will be provided to stakeholders. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to the Company’s long-term resource planning.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission’s standard protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.² PacifiCorp will be holding stakeholder workshops where proprietary cost data and models, commercially sensitive pricing information, and confidential market analyses and business projections will be discussed. PacifiCorp will be exposed to

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information”). See also *In re Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a party to trade secrets and other confidential commercial information” and “to facilitate the communication of information between litigants”).

² OAR 860-00 1-0080(2).

competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

It is also substantially likely that the parties to this proceeding will seek to discover further information held by PacifiCorp after the 2015 IRP is filed on March 31, 2015, including confidential and proprietary business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

For these reasons, PacifiCorp respectfully requests that the Commission enter its general protective order in this docket. The Company requests expedited consideration of this motion to allow stakeholders who execute the protective order to participate in confidential workshops scheduled for December 8 and 10, 2014.

Respectfully submitted this 2nd day of December, 2014.

By:

A handwritten signature in black ink, appearing to read "Dustin Till", written over a horizontal line.

Dustin Till
Senior Counsel
PacifiCorp d/b/a Pacific Power

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's 2015 Integrated Resource Plan Motion for Protective Order on the parties listed below via electronic mail and/or Overnight Delivery in compliance with OAR 860-001-0180.

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Dated this 2nd of December, 2014.



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