



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

August 27, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: LC 77—PacifiCorp's 2021 Integrated Resource Plan—Motion for General Protective Order—Expedited Consideration Requested

PacifiCorp d/b/a Pacific Power intends to file an Integrated Resource Plan (IRP) on September 1, 2021. The workpapers submitted with the IRP include confidential information. Accordingly, PacifiCorp requests that the Public Utility Commission of Oregon grant the enclosed motion for a general 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 PacifiCorp's 2019 IRP.

Please direct any inquiries about this filing to Cathie Allen at (503) 813-5934.

Sincerely,

Shelley McCoy
Director, Regulation

Enclosure

Cc: Service List – LC 70

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 77

In the Matter of
PACIFICORP d/b/a PACIFIC POWER's
2021 Integrated Resource Plan.

**MOTION FOR GENERAL
PROTECTIVE ORDER**

Expedited Consideration Requested

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) moves the Public Utility Commission of Oregon (Commission) for entry of a general protective order in this proceeding. PacifiCorp will file its 2021 Integrated Resource Plan (IRP) on September 1, 2021. PacifiCorp requests expedited consideration of this motion to facilitate the timely provision of the confidential workpapers supporting its 2021 IRP. 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 general protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.² After the filing of the 2021 IRP, PacifiCorp will be holding a post-IRP filing public input meeting where proprietary cost data and

¹ See OAR 860-001-0080(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(1) (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 860-001-0080(2).

models, commercially sensitive pricing information, and confidential market analyses and business projections will likely be discussed. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

It is also substantially likely that parties to this proceeding will seek to discover further information held by PacifiCorp after the 2021 IRP is filed on September 1, 2021, 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. PacifiCorp requests expedited consideration of this motion to allow stakeholders who execute the protective order to receive confidential information to assist their review of the 2021 IRP and participate in a future public input meeting.

Respectfully submitted this 27th day of August, 2021.

By: 
Carla Scarsella, OSB #193139
Senior Attorney
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
PHONE: (503) 813-6338
EMAIL: carla.scarsella@pacificorp.com