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June 3, 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 LC 78 – In the Matter of Idaho Power Company’s 2021 Integrated Resource Plan (“IRP”).**

Attention Filing Center:

Attached for filing in the above-referenced docket is Idaho Power Company’s Motion for Protective Order. Expedited consideration is requested.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Suzanne Prinsen".

Suzanne Prinsen  
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 78**

In the Matter of  
IDAHO POWER COMPANY'S  
2021 Integrated Resource Plan.

MOTION FOR PROTECTIVE ORDER  
*Expedited Consideration Requested*

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 information  
5 related to the Company's filed 2021 Integrated Resource Plan. Idaho Power requests  
6 expedited consideration of this motion.

7 In support of this Motion, the Company states:

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

16 2. On December 30, 2021, Idaho Power filed its 2021 Integrated Resource Plan.  
17 Through the discovery process, Idaho Power has received discovery requests that seek to  
18 obtain commercially sensitive material, and it is substantially likely that Staff and others in this  
19 proceeding will seek to discover additional confidential information. "The Commission's

1 standard blanket protective order is designed to facilitate discovery in cases involving discovery  
2 of large numbers of documents.” See *In re Portland Extended Area Service Region*, Docket  
3 UM 261, Order No. 91-958 (1991). Issuance of a protective order will facilitate the production  
4 of relevant information and expedite the discovery process.

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

DATED: June 3, 2022

McDOWELL RACKNER GIBSON PC



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Lisa Rackner

**IDAHO POWER COMPANY**

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