



900 S.W. Fifth Avenue, Suite 2600
Portland, Oregon 97204
main 503.224.3380
fax 503.220.2480
www.stoel.com

March 10, 2006

KATHERINE A. MCDOWELL
Direct (503) 294-9602
kamcdowell@stoel.com

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

**Re: Motion for Standard Protective Order
Docket UE 179**

Enclosed for filing is PacifiCorp's Motion for Standard Protective Order in the above-referenced matter. A copy of this filing was served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,


Katherine A. McDowell
KAP

KAM:knp
Enclosure
cc: Service List

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 179

In the Matter of PACIFICORP, d/b/a
PACIFIC POWER & LIGHT COMPANY
Request for a General Rate Increase

**PACIFICORP'S MOTION FOR
STANDARD PROTECTIVE ORDER**

Pursuant to OAR 860-012-0035(1)(k), PacifiCorp moves for entry of the Commission's standard protective order in this proceeding. As good cause for this motion, PacifiCorp states:

1. The Commission's rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information. *See* OAR 860-11-0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); 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 (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. PacifiCorp anticipates that discovery in this proceeding may include propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, confidential employee data, or confidential information regarding contracts for the purchase or sale of electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

3. It is substantially likely that Staff and others in this proceeding will seek to discover a large amount of information held by PacifiCorp, including confidential business

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

6 For the foregoing reasons, PacifiCorp requests entry of the Commission's standard
7 protective order in this docket.

8 DATED: March 10, 2006.

9 STOEL RIVES LLP

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12 Katherine A. McDowell
13 Stephen C. Hall

14 Attorneys for PacifiCorp
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing document in
3 Docket UE 179 on the following named person(s) on the date indicated below by email and
4 first-class mail addressed to said person(s) at his or her last-known address(es) indicated
5 below.

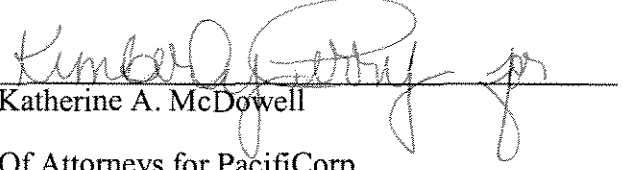
6 Lowrey R. Brown
7 Citizens' Utility Board of Oregon
8 610 SW Broadway, Suite 308
Portland, OR 97205
lowrey@oregoncub.org

Jason Eisdorfer
Citizens' Utility Board
610 SW Broadway, Suite 308
Portland, OR 97205
jason@oregoncub.org

9 Jason W. Jones
10 Department of Justice
11 1162 Court Street NE
Salem, OR 97301-4096
jason.w.jones@state.or.us

Michael T. Weirich
Department of Justice
1162 Court Street NE
Salem, OR 97304-4096
michael.weirich@state.or.us

12 DATED: March 10, 2006

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15 Katherine A. McDowell

16 Of Attorneys for PacifiCorp
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STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600, Portland, OR 97204
Main (503) 224-3380 Fax (503) 220-2480