McDowell & Rackner PC

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April 3, 2007

VIA ELECTRONIC FILING

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

Re: Docket No. UE 191

Enclosed for filing is PacifiCorp's Motion for Standard Protective Order in the above-referenced docket. Pending establishment of a service list in this proceeding, a copy of this filing was served on all parties to our last rate case, UE 179.

Very truly yours,

Katherine A. McDowell

Enclosures cc: UE 179 Service List

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON		
2	OF OREGON		
3	UE	191	
4	In the Matter of PACIFICORP's 2008 Transition Adjustment Mechanism.	MOTION FOR STANDARD PROTECTIVE ORDER	
5	Hanston Aujustnent Mechanism.		
6			
7	Pursuant to OAR 860-012-0035(1)(k), PacifiCorp moves for entry of the		
8	Commission's standard protective order in this proceeding. As good cause for this motion,		
9	PacifiCorp states:		
10	1. The Commission's rules authorize PacifiCorp to seek reasonable restrictions		
11	on discovery of trade secrets and other confidential business information. See OAR 860-11-		
12	0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); ORCP 36(C)(7) (providing		
13	protection against unrestricted discovery of "trade secrets or other confidential research,		

14 development, or commercial information"). See also In re Investigation into the Cost of
15 Providing Telecommunication Service (UM 351), Order No. 91-500 (1991) (recognizing that
16 protective orders are a reasonable means to protect "the rights of a party to trade secrets
17 and other confidential commercial information" and "to facilitate the communication of
18 information between litigants").

PacifiCorp anticipates that discovery in this proceeding may include
 proprietary cost data and models, commercially sensitive load and resource projections and
 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. PacifiCorp has asked the Commission to expedite review of its filing in this
 case. Issuance of a protective order will facilitate the production of relevant information, aid
 the discovery process and expedite resolution of this case.

Page 1 - PACIFICORP'S MOTION FOR STANDARD PROTECTIVE ORDER

McDowell & Rackner PC 520 SW Sixth Avenue, Suite 830 Portland, OR 97204

1	For the foregoing reasons, PacifiCorp requests entry of the Commission's standard	
2	protective order in this docket.	
3	DATED: April 3, 2007. McE	OWELL & RACKNER PC
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6	/	erine A. McDowell
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Page	2 - PACIFICORP'S MOTION FOR STAND	ARD PROTECTIVE ORDER

1	CERTIFICATE OF SERVICE		
2	I hereby certify that I served a true and correct copy of the foregoing document on		
3	the following named person(s) on the date indicated below by email and first-class mail		
4	addressed to said person(s) at his or her last-known address(es) indicated below.		
5 6	Jim Abrahamson Kurt Boehm Oregon Energy Coordinators Assoc Boehm Kurtz & Lowry PO Box 7964 36 E. Seventh Street, Suite 1510		
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12	& Lloyd LLP PO Box 928		
13	1001 SW Fifth Avenue, Suite 20001201 Court Street NE, Suite 200Portland, OR 97204Salem, OR 97308efinklea@chbh.comafogue@orcities.org		
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6	Michael T. Weirich Department of Justice	
7	Regulated Utility & Business Section 1162 Court Street, NE	
8	Salem, OR 97301-4096	,
9	<u>michael.weirich@doj.state.or.us</u> DATED: April 3, 2007.	
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11		Kelleller
12		Katherine A. McDowell
13		Of Attorneys for PacifiCorp
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