

April 2, 2008

### VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

Oregon Public Utility Commission 550 Capitol Street NE, Suite 215 Salem, OR 97310-2551

Attn: Vikie Bailey-Goggins, Administrator

Regulatory and Technical Support

RE: UE-199 - 2009 Transition Adjustment Mechanism

Motion for General Protective Order

Enclosed for filing by PacifiCorp d.b.a. Pacific Power is the Company's Motion for General Protective Order, with expedited consideration requested, in the above-referenced docket. Pending establishment of a service list in this proceeding, a copy of this filing was served on all parties in last transition adjustment mechanism filing, Docket UE 191.

Informal inquiries on this matter may be directed to Joelle Steward, Regulatory Manager, at 503-813-5542.

Very truly yours,

Andrea L. Kelly

Vice President, Regulation

**Enclosure** 

# BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

#### **UE 199**

In the Matter of PACIFICORP's d.b.a. PACIFIC POWER 2009 Transition Adjustment Mechanism.

# MOTION FOR GENERAL PROTECTIVE ORDER

## **Expedited Consideration Requested**

Pursuant to OAR 860-012-0035(1)(k), PacifiCorp dba Pacific Power ("Company") moves for the expedited entry of the Public Utility Commission of Oregon's ("Commission") general 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 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. This confidential business information is of significant commercial value, which could expose the Company to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.
- 3. The Company requests expedited consideration of this Motion to allow parties who execute the protective order to obtain prompt access to the confidential workpapers in support of the Company's 2009 Transition Adjustment Mechanism and to expedite any discovery in this proceeding. Accordingly, issuance of a protective order will facilitate the

- 1 production of relevant information, aid the discovery process, and expedite resolution of
- 2 this case.

DATED: April 2, 2008

Ryan Flynn

Legal Counsel

PacifiCorp

#### CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2008, I caused to be served, via E-Mail and Overnight Delivery (to those parties who have not waived paper service), a true and correct copy of the foregoing document on the following named person(s) at his or her last-known address(es) indicated below.

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