



825 NE Multnomah, Suite 2000  
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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-200** - 2009 Renewable Adjustment Clause  
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 Docket UM 1330.

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 200**

In the Matter of PACIFICORP's d.b.a.  
PACIFIC POWER 2009 Renewable  
Adjustment Clause

**MOTION FOR GENERAL  
PROTECTIVE ORDER**

**Expedited Consideration Requested**

1 Pursuant to OAR 860-012-0035(1)(k), PacifiCorp dba Pacific Power (the  
2 "Company") moves for the expedited entry of the Public Utility Commission of Oregon's  
3 ("Commission") general protective order in this proceeding. As good cause for this  
4 motion, PacifiCorp states:

5 1. The Commission's rules authorize PacifiCorp to seek reasonable restrictions  
6 on discovery of trade secrets and other confidential business information. *See* OAR 860-  
7 11-0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); ORCP 36(C)(7)  
8 (providing protection against unrestricted discovery of "trade secrets or other confidential  
9 research, development, or commercial information"). *See also In re Investigation into the*  
10 *Cost of Providing Telecommunication Service* (UM 351), Order No, 91-500 (1991)  
11 (recognizing that protective orders are a reasonable means to protect "the rights of a party  
12 to trade secrets and other confidential commercial information" and "to facilitate the  
13 communication of information between litigants").

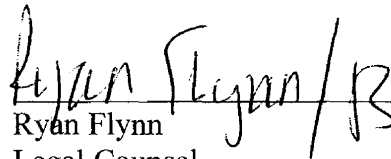
14 2. PacifiCorp anticipates that discovery in this proceeding may include  
15 proprietary cost data and models, commercially sensitive load and resource projections,  
16 and confidential information regarding the acquisition of resources providing electric  
17 power, power services, or other materials. This confidential business information is of  
18 significant commercial value, which could expose the Company to competitive injury if it  
19 is forced to make unrestricted disclosure of its confidential business information.

20 3. The Company requests expedited consideration of this Motion to allow parties  
21 who execute the protective order to obtain prompt access to the confidential testimony filed  
22 in support of the Company's 2009 Renewable Adjustment Clause and to expedite any

1 discovery in this proceeding. Accordingly, issuance of a protective order will facilitate the  
2 production of relevant information, aid the discovery process, and expedite resolution of  
3 this case

4 For the foregoing reasons, PacifiCorp requests expedited entry of the Commission's  
5 standard protective order in this docket.

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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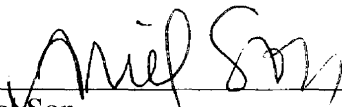
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