

February 27, 2012

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

Attn: Filing Center

RE: UE 246 - PacifiCorp's Motion for a General Protective Order
Expedited Consideration Requested

In anticipation of filing a general rate case on March 1, 2012, PacifiCorp d/b/a Pacific Power ("PacifiCorp or the Company") encloses for filing a Motion for a General Protective Order. The Company understands that its general rate case filing has been assigned docket UE 246.

Please contact Bryce Dalley, Director of Regulatory Affairs, at (503) 813-6389 for questions on this matter.

Sincerely,



William R. Griffith
Vice President, Regulation

Enclosure

Cc: Service List – UE 217

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 246**

In the Matter of
PACIFICORP d/b/a PACIFIC POWER's
Request for a General Rate Revision.

**PACIFICORP'S MOTION FOR A
GENERAL PROTECTIVE ORDER
EXPEDITED CONSIDERATION
REQUESTED**

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power
2 (Company) moves the Public Utility Commission of Oregon (Commission) for entry of a general
3 protective order in these proceedings. The Company will file a request for a general rate increase
4 on March 1, 2012. The initial filing, including the Company's responses to many of Commission
5 Staff's Standard Data Requests, will include confidential information. The Company requests
6 expedited consideration of this motion in order to promptly provide to parties the confidential
7 information in the initial filing. Good cause exists to issue a protective order to protect
8 commercially sensitive and confidential business information related to the Company's request
9 for a general rate increase.

10 The Commission's rules authorize PacifiCorp to seek reasonable restrictions on
11 discovery of trade secrets and other confidential business information.¹ The Commission's
12 general protective order is designed to allow the broadest possible discovery consistent with
13 the need to protect confidential information.² PacifiCorp's initial filing in this case includes
14 propriety cost data and models, commercially sensitive pricing information, confidential

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); 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*, Docket 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").

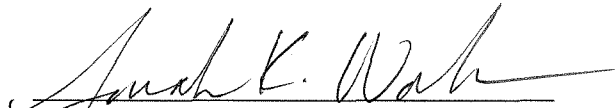
² OAR 860-001-0080(2).

1 market analyses and business projections, and confidential information regarding contracts
2 for the purchase or sale of electric power, power services, or fuel. PacifiCorp will be exposed
3 to competitive injury if it is forced to make unrestricted disclosure of its confidential business
4 information.

5 It is also substantially likely that the parties to these proceedings will seek to discover
6 further information held by PacifiCorp, including confidential business information. Issuance
7 of a protective order will facilitate the production of relevant information and expedite the
8 discovery process.

9 For these reasons, PacifiCorp respectfully requests that the Commission enter its
10 general protective order in this docket. The Company requests expedited consideration of this
11 motion to allow parties who execute the protective order to promptly obtain the confidential
12 information in the initial filing and responses to discovery requests.

DATED: February 27, 2012


Sarah K. Wallace
Senior Counsel
PacifiCorp d/b/a Pacific Power

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document, in Docket UE 217, on the date indicated below by email, addressed to said parties at his or her last-known address(es) indicated below.

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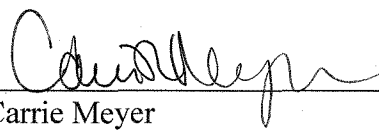
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DATED: February 27, 2012



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