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March 15, 2013

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

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

Attn: Filing Center

**RE: UE 267—PacifiCorp's Motion for a Protective Order**

PacifiCorp d/b/a Pacific Power encloses for filing an original and one copy of its Motion for Protective Order in the above referenced proceeding.

Please contact Bryce Dalley, Director of Regulatory Affairs, at (503) 813-6389 with any questions.

Sincerely,

A handwritten signature in black ink that reads "William R. Griffith / RB".

William R. Griffith  
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 267**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Transition Adjustment, Five-Year Cost of  
Service Opt-Out

PACIFICORP D/B/A PACIFIC POWER'S  
MOTION FOR PROTECTIVE ORDER

1           Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power  
2 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for  
3 entry of a standard protective order in this proceeding. Good cause exists to issue a  
4 protective order to protect commercially sensitive and confidential business information  
5 related to the Company's direct access program.

6           The Commission's rules authorize PacifiCorp to seek reasonable restrictions on  
7 discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission's  
8 standard protective order is designed to allow the broadest possible discovery consistent with  
9 the need to protect confidential information.<sup>2</sup> PacifiCorp requests this protective order to  
10 facilitate the communication of information between the parties.

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

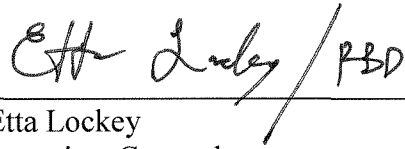
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<sup>1</sup> See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See 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").

<sup>2</sup> OAR 860-001-0080(2).

1           For these reasons, PacifiCorp respectfully requests that the Commission enter its  
2   standard protective order in this docket.

Respectfully submitted this 15th day of March, 2013.



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Etta Lockett  
Associate Counsel  
PacifiCorp d/b/a Pacific Power

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