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November 15, 2016

VIA ELECTRONIC

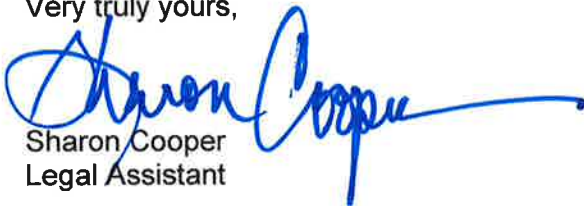
PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

**Re: Docket No. UE 316 - In the Matter of the Application of IDAHO POWER COMPANY
for Application for Authority to Increase Rates for Electric Service to Recover
Costs Associated with the North Valmy Power Plant.**

Attention Filing Center:

Attached for filing in the above-referenced docket is an electronic copy of Idaho Power Company's Motion for Protective Order. Please contact this office with any questions.

Very truly yours,



Sharon Cooper
Legal Assistant

Enclosure

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 316**

4 In the Matter of

5 IDAHO POWER COMPANY

6 Application for Authority to Increase Rates
7 for Electric Service to Recover Costs
8 Associated with the North Valmy Power
9 Plant.

MOTION FOR PROTECTIVE ORDER

10 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho
11 Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's
12 ("Commission") general protective order in this proceeding. Good cause exists to issue a
13 Protective Order to protect commercially sensitive and confidential business information related
14 to the Company's filed Application for Authority to Increase Rates for Electric Service to Recover
15 Costs Associated with the North Valmy Power Plant.

16 In support of this Motion, the Company states:

17 1. The Commission's rules authorize Idaho Power to seek reasonable restrictions on
18 discovery of trade secrets and other confidential business information. See 860-001-0080;
19 ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other
20 confidential research, development, or commercial information"); see also *In re Investigation*
21 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
22 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a
23 party to trade secrets and other confidential commercial information" and "to facilitate the
24 communication of information between litigants").

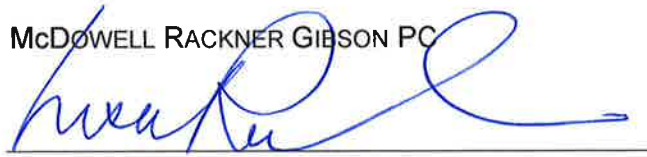
25 2. November 2, 2016, Idaho Power filed its Application for Authority to Increase Rates
26 for Electric Service to Recover Costs Associated with the North Valmy Power Plant. It is

1 expected that certain documents related to the filing will contain confidential material, including
2 but not limited to proprietary cost data and models, commercially sensitive load and resource
3 projections, confidential market analyses and business projections, and confidential information
4 regarding contracts for the purchase or sale of electric power, power services, or fuel. Public
5 disclosure of the confidential information could be detrimental to Idaho Power and its customers.

6 3. It is substantially likely that Staff and others in this proceeding will seek to discover
7 confidential business information. "The Commission's standard blanket protective order is
8 designed to facilitate discovery in cases involving discovery of large numbers of documents."
9 *See In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).
10 Issuance of a protective order will facilitate the production of relevant information and expedite
11 the discovery process.

12 For the foregoing reasons, Idaho Power requests entry of a standard Protective Order
13 in this docket.

14 DATED: November 15, 2016.

McDOWELL RACKNER GIBSON PC


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16
17 Lisa Rackner

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