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November 5, 2019

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-1088

Re: UE 366 – Idaho Power Company’s 2020 Annual Power Cost Update.

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.

Sincerely,

A handwritten signature in black ink that reads "Alisha Till".

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 366

In the Matter of
IDAHO POWER COMPANY
2020 Annual Power Cost Update.

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Idaho Power Company (“Idaho
2 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s
3 (“Commission”) general 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 filed 2020 Annual Power Cost Update.

6 In support of this Motion, the Company states:

7 1. The Commission’s rules authorize Idaho Power to seek reasonable restrictions
8 on discovery of trade secrets and other confidential business information. See 860-001-0080;
9 ORCP 36(C)(1) (providing protection against unrestricted discovery of “trade secrets or other
10 confidential research, development, or commercial information”); see also *In re Investigation*
11 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
12 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a
13 party to trade secrets and other confidential commercial information” and “to facilitate the
14 communication of information between litigants”).

15 2. On October 31, 2019, Idaho Power filed its 2020 Annual Power Cost Update.
16 Certain workpapers related to the filing contain confidential material, including but not limited
17 to proprietary cost data and models, commercially sensitive load and resource projections,
18 confidential market analyses and business projections, and confidential information regarding

1 contracts for the purchase or sale of electric power, power services, or fuel. Public disclosure
2 of the confidential information would be detrimental to Idaho Power and its customers.

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

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

DATED: November 5, 2019

McDOWELL RACKNER GIBSON PC



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IDAHO POWER COMPANY

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