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December 23, 2019

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: Docket UE 373
In the Matter of Idaho Power Company's Application for Authority to
Decrease its Rates for Electric Service for Costs Associated with Tax
Reform

Attention Filing Center:

Enclosed for filing is an electronic copy of Idaho Power Company's Motion for Protective Order, which is being filed concurrently with the Company's Application for Authority to Decrease its Rates for Electric Service for Costs Associated with Tax Reform.

Sincerely,

Wendy McIndoo
Office Manager

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 373

In the Matter of the Application of IDAHO
POWER COMPANY for Authority to
Decrease its Rates for Electric Service for
Costs Associated with Tax Reform.

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(1), OAR 860-001-0080 and OAR 860-001-0420, Idaho Power
2 Company ("Idaho Power" or "Company") moves for the entry of the Public Utility Commission
3 of Oregon's ("Commission") general protective order in this proceeding. Good cause exists to
4 issue a Protective Order to protect the Company's commercially sensitive and confidential
5 business information produced in this docket.

6 In support of this Motion, the Company states:

7 1. The Commission's rules authorize Idaho Power to seek reasonable restrictions on
8 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 December 23, 2019, Idaho Power filed its Application for Authority to Decrease
16 Its Rates for Electric Service for Costs Associated with Tax Reform. Certain portions of the
17 testimony and exhibits in Idaho Power's filing contain confidential material, including but not
18 limited to commercially sensitive business information. Public disclosure of the confidential
19 information would be detrimental to Idaho Power and its customers.

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

26 For the foregoing reasons, Idaho Power requests entry of a General Protective Order
27 in this docket.

DATED: December 23, 2019.

McDOWELL RACKNER GIBSON PC



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