



1 are a reasonable means to protect “the rights of a party to trade secrets and other confidential  
2 commercial information” and “to facilitate the communication of information between litigants”).

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4 2.

5 Avista anticipates that parties to this docket may request proprietary cost data and models,  
6 commercially sensitive load and resource projections, confidential market analyses and business  
7 projections, confidential employee data, and confidential information regarding contracts for the  
8 purchase or sale of natural gas. This confidential business information is of significant commercial  
9 value, which would expose the Company to competitive injury if disclosure is unrestricted.

10  
11 3.

12 It is substantially likely that Staff and other parties in this proceeding will seek to discover  
13 information held by Avista, including confidential business information. “The Commission’s  
14 standard blanket protective order is designed to facilitate discovery in cases involving discovery of  
15 large numbers of documents.” *See In re Portland Extended Area Service Region*, Docket UM 261,  
16 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of relevant  
17 information and expedite the discovery process.

18  
19 4.

20 The Company requests expedited consideration of this Motion to allow parties who execute  
21 the protective order to obtain prompt access to the confidential exhibits and workpapers in support  
22 of the Company’s request for a general rate increase and to expedite any discovery in this  
23 proceeding. In addition, in making its general rate filing, Commission rules require the submission

1 of responses to a set of standard information requests (see OAR 860-022-0019), and some of such  
2 responses contain confidential information.

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5.

5 Counsel for Avista has contacted counsel for Staff, CUB and NWIGU, all of the interveners  
6 in Avista's previous general rate case, and none oppose this motion.

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8 For the foregoing reasons, Avista requests expedited entry of the Commission's standard  
9 protective order in this docket.

DATED: November 29, 2016.



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David J. Meyer  
Chief Counsel for Regulatory and Governmental Affairs  
Avista Corporation