

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1050**

In the Matter of the Application of
PACIFICORP for an Investigation of Inter-
Jurisdictional Issues

MOTION FOR GENERAL
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 general protective order in the above-captioned proceeding. Good cause exists to
4 issue a Protective Order to protect commercially sensitive and confidential business
5 information related to the Company's Petition requesting approval of amendments to the
6 Inter-Jurisdictional Allocation Protocol allocation methodology previously approved by the
7 Commission in Order No. 11-244.


8 The Commission previously found good cause to issue protective orders in this
9 proceeding. *See Re Application of PacifiCorp for an Investigation of Inter-Jurisdictional*
10 *Issues*, Docket UM 1050, Order No. 10-365 (September 20, 2010); Order No. 03-638
11 (October 31, 2003); and Order No. 02-291 (April 22, 2002). The Company's need for a
12 protective order has not changed. However, the Commission's general protective order has
13 changed since the Commission last issued a protective order in this docket, so the Company
14 is requesting that the Commission issue its current general protective order.

15 The Company anticipates that parties to this docket may request proprietary cost data
16 and models, commercially sensitive load and resource projections, confidential market
17 analyses and business projections, and confidential information regarding contracts for the

1 purchase or sale of electric power, power services, or fuel. This confidential business
2 information is of significant commercial value, which could expose the Company to
3 competitive injury if disclosure is unrestricted.

4 For these reasons, PacifiCorp respectfully requests that the Commission enter its
5 current general protective order in this docket.

Respectfully submitted this 30th day of December 2015.

By: 

Matthew D. McVee
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PacifiCorp d/b/a Pacific Power