

McDowell & Rackner PC



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September 19, 2007

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1313

Enclose for filing in the above-referenced docket is Idaho Power Company's Motion for Standard Protective Order.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa F. Rackner".

Lisa F. Rackner

cc: Service List

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1313

In the Matter of Idaho Power Company
Application for an Accounting Order
Regarding Excess Net Power Expenses

**MOTION FOR STANDARD
PROTECTIVE ORDER**

Pursuant to OAR 860-012-0035(1)(k), Idaho Power Company moves for entry of the Commission's standard protective order in this proceeding. As good cause for this motion, Idaho Power Company states:

1. The Commission's rules authorize Idaho Power Company to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See OAR 860-11-0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing Telecommunication Service* (UM 351), Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a party to trade secrets and other confidential commercial information" and "to facilitate the communication of information between litigants").

2. Idaho Power Company anticipates that discovery in this proceeding may include proprietary cost data and models, and commercially sensitive load and resource projections. Idaho Power Company will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

3. Idaho Power Company has asked the Commission to expedite review of its filing in this case. Issuance of a protective order will facilitate the production of relevant information, aid the discovery process and expedite resolution of this case.

1 For the foregoing reasons, Idaho Power Company requests entry of the
2 Commission's standard protective order in this docket.

3 DATED: September 19, 2007. MCDOWELL & RACKNER PC

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5 Lisa F. Rackner

6 Of Attorneys for Idaho Power Company
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

Jason Eisdorfer
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jason@oregoncub.org

Lowrey R. Brown
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Bob Jenks
Citizens' Utility Board of Oregon
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DATED: September 19, 2007.



Lisa F. Rackner
Attorney for Idaho Power Company