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May 30, 2014

**VIA ELECTRONIC FILING & US MAIL**

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
PO Box 2148  
Salem, OR 97308-2148

Re: In the Matter of the Complaint of THREEMILE CANYON WIND I, LLC  
against PACIFICORP, dba PACIFIC POWER, Pursuant to ORS 756.500.  
**Docket No. UM-1546**

Dear Filing Center:

Enclosed please find the original and one copy of the Threemile Canyon Wind I, LLC's Motion for Protective Order in the above-referenced docket.

Thank you for your assistance with this matter. Should you have any questions, please call.

Very truly yours,

  
Richard G. Lorenz

RGL:sk  
Enclosure  
cc: UM-1546 Service List

4832-9061-4299

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1546**

THREEMILE CANYON WIND, LLC	)	
	)	MOTION FOR PROTECTIVE ORDER
Complainant,	)	
	)	
vs.	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	
	)	
Defendant.	)	

Pursuant to OAR 860-001-0080(1), Threemile Canyon Wind I, LLC (“Threemile Canyon”) moves for entry of the Public Utility Commission of Oregon’s (“Commission”) general protective order in this docket.

1. The Commission’s rules authorize a party to seek reasonable restrictions on discovery of trade secrets and other confidential business information. *See* OAR 860-001-0080(3) (allowing confidential designation of information that is protected under Oregon Rule of Civil Procedure 26(C)(7) or is exempt from public disclosure under the Public Records Law). *See also Re Investigation into the Cost of Providing Telecommunications Service*, Docket 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. The resolution of the issues in this docket will require the review of a Letter Agreement between PacifiCorp and Threemile Canyon which has been deemed confidential by the parties and contains confidential business information.

For the foregoing reasons, Threemile Canyon requests entry of the Commission's standard Protective Order in this docket on an ongoing basis.

DATED: May 30, 2014

/s/ Richard Lorenz

Richard Lorenz, OSB No. 003086

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Of Attorneys for the  
Threemile Canyon Wind I, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served the foregoing **THREEMILE CANYON WIND I, LLC'S MOTION FOR PROTECTIVE ORDER** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

**PACIFICORP**

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**PUBLIC UTILITY COMMISSION OF OREGON**

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Dated in Portland, Oregon, this 30<sup>th</sup> day of May, 2014.

/s/ Richard Lorenz

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