

McDowell Rackner & Gibson PC



WENDY MCINDOO
Direct (503) 595-3922
wendy@mcd-law.com

May 26, 2015

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

**Re: UM 1725 – In the Matter of IDAHO POWER COMPANY Application to Lower
Standard Contract Eligibility Cap and to Reduce the Standard Contract Term**

Attention Filing Center:

Attached for filing in the above-captioned docket is Idaho Power's Motion for Protective Order.

Please contact this office with any questions.

Very truly yours,

Wendy McIndoo
Office Manager

Enclosures

cc: ALJ Shani Pines
UM 1725 Service List

1 2. On April 24, 2015, Idaho Power filed the above-captioned applications and Motion
2 to Stay . It is expected that certain documents related to the filing will contain confidential
3 material, including but not limited to proprietary cost data and models, commercially sensitive
4 load and resource projections, confidential market analyses and business projections, and
5 confidential information regarding contracts for the purchase or sale of electric power, power
6 services, or fuel. Public disclosure of the confidential information could be detrimental to Idaho
7 Power and its customers.

8 3. It is substantially likely that Staff and others in this proceeding will seek to discover
9 confidential business information. "The Commission's standard blanket protective order is
10 designed to facilitate discovery in cases involving discovery of large numbers of documents."
11 *See In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).
12 Issuance of a protective order will facilitate the production of relevant information and expedite
13 the discovery process.

14 For the foregoing reasons, Idaho Power requests entry of a standard Protective Order
15 in this docket.

16 DATED: May 26, 2015.

McDOWELL RACKNER & GIBSON PC

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19 Lisa F. Rackner
20 Adam Lowney

21 **IDAHO POWER COMPANY**

22 Donovan Walker
23 Idaho Power Company
24 P.O. Box 70
25 1221 W. Idaho Street
26 Boise, Idaho 83707-0070
E-mail: dwalker@idahopower.com

Attorneys for Idaho Power Company