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April 28, 2021

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-108

Re: UM 1730(6) – *In the Matter of IDAHO POWER COMPANY, Application to Update Schedule 85 Qualifying Facility Information*

Attention Filing Center:

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

Please contact this office with any questions.

Thank you,

Jennifer Miller
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1730(6)

In the Matter of

IDAHO POWER COMPANY

Update to Avoided Cost Rates, Schedule
85, Cogeneration and Small Power
Production Standard Contract Rates.

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Idaho Power Company (“Idaho
2 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s
3 (“Commission”) general protective order in this proceeding. Good cause exists to issue a
4 Protective Order to protect commercially sensitive and confidential business information
5 related to the Company’s upcoming avoided cost price update.

6 In support of this Motion, the Company states:

7 1. The Commission’s rules authorize Idaho Power to seek reasonable restrictions
8 on discovery of trade secrets and other confidential business information. See 860-001-0080;
9 ORCP 36(C)(1) (providing protection against unrestricted discovery of “trade secrets or other
10 confidential research, development, or commercial information”); *see also In re Investigation*
11 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
12 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a
13 party to trade secrets and other confidential commercial information” and “to facilitate the
14 communication of information between litigants”).

15 2. On April 30, 2021, Idaho Power will file its avoided cost price update following the
16 Commission’s acknowledgement of the Company’s 2019 Integrated Resource Plan. Certain
17 workpapers related to the filing contain confidential material, including but not limited to

1 proprietary forward market price forecasts. Public disclosure of the confidential information
2 would be detrimental to Idaho Power and its customers.

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

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

DATED: April 28, 2021.

McDOWELL RACKNER GIBSON PC



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