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June 19, 2017

**VIA ELECTRONIC FILING**

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

**Re: Docket No. UM 1829  
Blue Marmot V LLC, Complainant, v. Portland General Electric, Defendant**

Attention Filing Center:

Attached for filing in the above-captioned docket is Portland General Electric Company's Motion for Protective Order.

Please contact this office with any questions.

Very truly yours,



Sharon Cooper  
Legal Assistant

Attachment

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1829**

4 Blue Marmot V LLC,  
Complainant,

5 v.

6 Portland General Electric,  
7 Defendant

MOTION FOR PROTECTIVE ORDER

8  
9 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Portland General Electric  
10 Company ("PGE" or "Company") moves for the entry of the Public Utility Commission of  
11 Oregon's ("Commission") general protective order in this proceeding. Good cause exists to  
12 issue a Protective Order to protect the Company's commercially sensitive and confidential  
13 business information produced in this docket.

14 In support of this Motion, the Company states:

15 1. The Commission's rules authorize PGE to seek reasonable restrictions on  
16 discovery of trade secrets and other confidential business information. See 860-001-0080;  
17 ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other  
18 confidential research, development, or commercial information"); see also *In re Investigation*  
19 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500  
20 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a  
21 party to trade secrets and other confidential commercial information" and "to facilitate the  
22 communication of information between litigants").

23 2. On May 18, 2017, PGE filed its Answer to Complaint in this docket. Blue Marmot  
24 has requested certain documents related to the filing that contain confidential material. "The  
25 Commission's standard blanket protective order is designed to facilitate discovery in cases  
26 involving discovery of large numbers of documents." See *In re Portland Extended Area Service*

1 *Region*, Docket UM 261, Order No. 91-958 (1991). Issuance of a protective order will facilitate  
2 the production of relevant information and expedite the discovery process.

3 For the foregoing reasons, PGE requests entry of a standard Protective Order in this  
4 docket.

5 Dated June 19, 2017

6 **MCDOWELL RACKNER & GIBSON PC**

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8 

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16 **PORTLAND GENERAL ELECTRIC COMPANY**

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