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August 23, 2017

**VIA ELECTRONIC FILING AND US MAIL**

Attention: Filing Center  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97308-1088

**Re: Docket UM 1892 – Portland General Electric Company Application for Waiver  
of the Competitive Bidding Guidelines.**

Dear Filing Center:

Attached for filing in the above-captioned docket is Portland General Electric Company's Motion for Protective Order. PGE's Application for Waiver of the Competitive Bidding Guidelines will be filed August 24, 2017.

Please contact this office with any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Lisa Rackner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lisa Rackner

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

3 **UM 1892**

4 In the Matter of

5 PORTLAND GENERAL ELECTRIC  
6 COMPANY,

7 Application for Waiver of the Competitive  
8 Bidding Guidelines.

MOTION FOR PROTECTIVE ORDER

**Expedited Treatment Requested**

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

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 August 24, 2017, PGE will be filing its Application for Waiver of the  
24 Competitive Bidding Guidelines, with supporting exhibits and testimony. Certain of the  
25 exhibits to the testimony will include confidential and proprietary business and financial  
26

1 information regarding ongoing business negotiations and PGE’s proprietary procedures and  
2 scoring of offers received in the negotiations. If this confidential and proprietary business  
3 information were to become public, PGE and others will be exposed to competitive injury.  
4 “The Commission’s standard blanket protective order is designed to facilitate discovery in  
5 cases involving discovery of large numbers of documents.” *See In re Portland Extended Area*  
6 *Service Region*, Docket UM 261, Order No. 91-958 (1991). Issuance of a protective order will  
7 facilitate the production of relevant information and expedite the discovery process.

8 PGE seeks expedited treatment of this Motion to prevent any delay in the parties’  
9 ability to sign the Protective Order and begin reviewing the confidential information.

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

12 DATED: August 23, 2017.

**MCDOWELL RACKNER GIBSON PC**

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14  
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Lisa F. Rackner, OSB 873844

Jordan R. Schoonover, OSB 145050

**PORTLAND GENERAL ELECTRIC COMPANY**

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25 Company  
26

**CERTIFICATE OF SERVICE – UM 1892**

I hereby certify that I served a true and correct copy of **Portland General Electric Company’s Motion for Protective Order** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

**C=Confidential**

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Dated this 23rd day of August, 2017.

  
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