

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM - _____

In the Matter of
Calpine Energy Solutions, LLC's
2017 RPS Report

**CALPINE ENERGY
SOLUTIONS, LLC'S MOTION FOR
A GENERAL PROTECTIVE ORDER**

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), Calpine Energy Solutions,
2 LLC ("Calpine Solutions") moves the Public Utility Commission of Oregon
3 (Commission) for entry of a general protective order in these proceedings. Calpine
4 Solutions filed its 2017 RPS Report on _____, 2018. The filing included
5 confidential information. Good cause exists to issue a protective order to protect
6 commercially sensitive and confidential business information related to Calpine
7 Solutions' Filing.

8 The Commission's rules authorize Calpine Solutions to seek reasonable
9 restrictions on discovery of trade secrets and other confidential business information.¹
10 The Commission's general protective order is designed to allow the broadest possible
11 discovery consistent with the need to protect confidential information.² Calpine
12 Solutions' initial filing in this case contains commercially sensitive pricing
13 information, load information, and confidential information regarding contracts for

¹See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). See also *In re Investigation into the Cost of Providing Telecommunication 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 communications of information between litigants").

²OAR 860-001-0080(2)

14 the purchase of RECs. Calpine Solutions will be exposed to competitive injury if it is
1 forced to make unrestricted disclosure of its confidential business information.

2 It is also possible that the parties to these proceedings will seek to discover
3 further information held by Calpine Solutions, including confidential business
4 information. Issuance of a protective order will facilitate the production of relevant
5 information and expedite the discovery process.

6 For these reasons, Calpine Solutions respectfully requests that the
7 Commission enter its general protective order in this docket.

DATED: May 31, 2015



Greg Bass
Director
Calpine Energy Solutions, LLC