



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

November 2, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

**RE: UM 1968—Motion for General Protective Order—Expedited Consideration
Requested**

PacifiCorp d/b/a Pacific Power encloses for filing the attached Motion for a General Protective Order in the above-referenced proceeding.

Please direct any inquiries about this filing to Natasha Siores at (503) 813-6583.

Sincerely,

A handwritten signature in black ink, appearing to read "Etta Lockey".

Etta Lockey
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1968

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Application for Authority to Implement
Revised Depreciation Schedule.

MOTION FOR PROTECTIVE ORDER

Expedited Consideration Requested

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power moves the Public Utility Commission of Oregon (Commission) for entry of a standard protective order in this proceeding. On September 13, 2018, PacifiCorp filed an application for authority to implement revised depreciation rates (Application). A prehearing conference on this matter was held on October 29, 2018, and parties have begun to submit requests for discovery that include requests for information that is considered confidential by the company.

PacifiCorp requests expedited consideration of this motion to facilitate the timely response to discovery in this matter. Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information related to the company's forward-looking, proprietary, and trade secret information.

The Commission's rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission's standard protective order is designed to allow the broadest possible discovery consistent with


¹ See 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 communication of information between litigants").

the need to protect confidential information.² Parties may request commercially sensitive pricing information, and confidential market analyses, and business projections to conduct their analysis of the Application. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

For these reasons, PacifiCorp respectfully requests that the Commission enter its standard protective order in this docket. The company requests expedited consideration of this motion to allow stakeholders that execute the protective order to receive confidential information to assist in their review of the Application.

Respectfully submitted this 2nd day of November, 2018.

By:



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² OAR 860-001-0080(2).