BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

Docket No. UM 2009

MADRAS PV1, LLC,

Complainant,

v.

PORTLAND GENERAL ELECTRIC COMPANY,

Respondent.

MOTION FOR PROTECTIVE ORDER

Expedited Consideration Requested

Under ORCP 36(C)(7) and OAR 860-001-0080(1), Madras PV1, LLC ("Madras Solar") moves the Public Utility Commission of Oregon ("Commission") for entry of the Commission's general protective order in this proceeding. On April 22, 2019, Madras Solar filed a complaint regarding a negotiated power purchase agreement ("PPA") in this docket, and supporting testimony. Portland General Electric Company ("PGE") and Madras Solar have agreed to treat certain attachments to those filings as confidential, and those attachments are required to be filed with the Commission in this proceeding under OAR 860-029-0100(5)(e). A protective order is therefore appropriate, in order to allow those attachments to be viewed by parties to the proceeding that qualify under a protective order. Additional confidential information may also need to be exchanged or filed in this proceeding, and the Commission's general protective order would facilitate any such exchange or filings.

Expedited consideration is requested, so that the documents can be made available under appropriate provisions in a timely manner, to ensure that the processing of the case is not impacted by the need to designate certain information as confidential.

Madras Solar therefore requests that the Commission enter its standard general protective order in this docket. PGE supports this motion.

Respectfully submitted this 30th day of April, 2019.

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