

LISA D. NORDSTROM Lead Counsel Inordstrom@idahopower.com

January 30, 2023

VIA ELECTRONIC FILING

Public Utility Commission of Oregon 3930 Fairview Industrial Drive SE P.O. Box 1088 Salem, Oregon 97308-1088

Re: Docket No. UM 2035

Idaho Power Company's Transportation Electrification Plan

Attention Filing Center:

Attached for electronic filing in the above-referenced matter is Idaho Power Company's Motion for Protective Order, expedited consideration is requested.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Lisa D. Nordstrom

LDN/sg

Attachment

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UM 2035			
3				
4	In the Matter of	MOTION FOR PROTECTIVE		
5	Idaho Power Company,	ORDER		
6 7	TRANSPORTATION ELECTRIFICATION PLAN	Expedited Consideration Requested		
8	Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho			
9	Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's			
10	("Commission") general protective order in this proceeding. Good cause exists to issue a			
11	Protective Order to protect commercially sensitive and confidential business information,			
12	including customer data, that is considered to be of a trade secret, privileged or confidential			
13	nature.			
14	Idaho Power requests expedited consideration of this motion in accordance with			
15	OAR 860-001-0420(6), which will allow the Company to timely provide confidential			
16	attachments to Staff.			
17	In support of this Motion, the Company states:			
18	1. The Commission's rules authorize reas	sonable restrictions on discovery of trade		
19	secrets and other confidential business information. See 860-001-0080; ORCP 36(C)(7)			
20	(providing protection against unrestricted discovery of "trade secrets or other confidential			
21	research, development, or commercial information"). See also In re Investigation into the			
22	Cost of Providing Telecommunication Service, Docket UM 351, Order No. 91-500 (1991)			
23	(recognizing that protective orders are a reasonable means to protect "the rights of a party			
24	to trade secrets and other confidential commercial information" and "to facilitate the			
25	communication of information between litigants").			

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1	2. On December 23, 2022, Idaho Power filed its Transportation Electrification		
2	Plan. On January 31, 2023, Idaho Power will file its responses to Staff's Data Request Nos.		
3	3-9 that contain confidential material. Public disclosure of the confidential information could		
4	be detrimental to Idaho Power and its respective customers.		
5	3. It is likely that Staff and others in this proceeding will seek to discover		
6	confidential customer and business information. "The Commission's standard blanket		
7	protective order is designed to facilitate discovery in cases involving discovery of large		
8	numbers of documents." See In re Portland Extended Area Service Region, Docket No. UM		
9	261, Order No. 91 -958 (1991). Issuance of a protective order will facilitate the production		
10	of relevant information and expedite the discovery process.		
11	For the foregoing reasons, Idaho Power request entry of a standard Protective		
12	Order in this docket.		
13	DATED: January 30, 2023		
14	Q. 041		
15	Lin D. Madotrom		
16	Lisa Nordstrom (OSB # 973528) Attorney for Idaho Power Company		
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1	CERTIFICATE	OF SERVICE	
2	UM 2035		
3	I hereby certify that on January 30, 2023, I served a true and correct copy of Idaho		
4	Power Company's Motion for Protective Order, by e-mail to said person(s) as indicated		
5	below.		
6	Eric Shierman	Graham Bates	
7	Public Utility Commission of Oregon eric.shierman@puc.oregon.gov	Oregon Department of Environmental Quality	
8		graham.bates@deq.oregon.gov	
9	Neil Baunsgard The Environmental Center	Annabel Drayton Northwest Energy Coalition	
10	neil@envirocenter.org	annabel@nwenergy.org	
11	Evan Elias	Jason Salmi Klotz	
12	Oregon Department of Energy Evan.m.elias@energy.oregon.gov	Portland General Electric Jason.klotz@pgn.com	
13			
14	Gerik Kransky Oregon Department of Environmental	Renee Samson Freewire	
15	Quality gerik.kransky@deq.oregon.gov	rsamson@freewiretech.com	
16			
17	Rebecca Smith	Francesca Wahl	
18	Oregon Department of Energy rebecca.smith@energy.oregon.gov	Tesla fwahl@tesla.com	
19			
20	Michael Orman Oregon Department of Environmental	Wendy Simons Oregon Department of Energy	
21	Quality michael.orman@deq.oregon.gov	wendy.simons@energy.oregon.gov	
22			
23	Scott Dunbar Keyes & Fox	Alexandra Leumer Chargepoint	
24	sdunbar@keyesfox.com	alexandra.leumer@chargepoint.com	
25	Betsy Bridge Oregon Department of Justice	Caroline Cilek Green Energy Institute	
26	Betsy.bridge@doj.state.or.us	carolinecilek@lclark.edu	

1	Erick Karlen Shell Recharge Solutions	Kate Ayres Oregon Citizen's Utility Board
2	ekarlen@shellrecharge.com	kate@oregoncub.org
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4	DATED: January 30, 2023.	
5		Stary Cust
6		Stacy Gust, Regulatory
7		Administrative Assistant
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