



825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

March 14, 2023

VIA ELECTRONIC FILING

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

Re: UM 2056—PacifiCorp's Motion for General Protective Order

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for General Protective Order.

Please direct any inquiries about this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2056

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Oregon Transportation Electrification Plan

MOTION FOR GENERAL
PROTECTIVE ORDER

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for entry of a general protective order in this proceeding. PacifiCorp filed its Draft 2023 Transportation Electrification Plan in docket UM 2056 on February 14, 2023. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to this filing.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission’s general protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.² PacifiCorp has received discovery requests related to the Draft 2023 Transportation Electrification Plan, including requests that may require producing commercially sensitive and confidential business information. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(1) (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 No. 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”).

² OAR 860-001-0080(2).

confidential business information. It is also substantially likely that the parties to this proceeding will seek to discover further information held by PacifiCorp, including 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 general protective order in this docket.

Respectfully submitted this 14th day of March, 2023.

A handwritten signature in cursive script that reads "Carla Scarsella". The signature is written in black ink and is positioned above a horizontal line.

Carla Scarsella OB#193139
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