

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2107

WILLAMETTE FALLS PAPER
COMPANY, AND WEST LINN PAPER
COMPANY

Complainant, v.

PORTLAND GENERAL
ELECTRIC COMPANY,

Defendant.

**WILLAMETTE FALLS PAPER
COMPANY’S AND WEST LINN
PAPER COMPANY’S MOTION FOR A
GENERAL PROTECTIVE ORDER**

Under ORCP 36(C)(1) and OAR 860-001-0080(1), Willamette Falls Paper Company and West Linn Paper Company (“Complainants”), move the Public Utility Commission of Oregon (“Commission”) for entry of a general protective order in this proceeding to protect commercially sensitive and confidential business information. Good cause exists to issue a protective order to protect Complainants commercially sensitive and confidential business information.

In support of this Motion, Complainants state:

1. The Commission’s rules authorize Complainants to seek reasonable restrictions on discovery of trade secrets and other confidential business information. *See* OAR 860-001-0080; ORCP 36(C)(1) (providing protection against unrestricted discovery of “a trade secret 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”).

2. Complainants have issued a First Set of Data Requests to PGE seeking documents and information from PGE that may qualify as trade secrets and other confidential commercial information. Complainants also anticipate that PGE will seek information from Complainants that may qualify as a trade secret for confidential commercial information. Complainants and PGE could be exposed to competitive injury if they are forced to make unrestricted disclosure of such confidential business information.

3. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process in this proceeding.

4. Counsel for Complainants has conferred with counsel for PGE and PGE does not object to his motion.

For the foregoing reasons, Complainants respectfully requests entry of a standard protective order in this proceeding.

DATED this 14th day of July, 2020.

Respectfully submitted,

s/ Chad M. Stokes

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