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October 7, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 2118 – Sunthurst Energy, LLC vs PacifiCorp dba Pacific Power

Attention Filing Center:

Attached for filing in the above-captioned docket is PacifiCorp's Motion for Protective Order.

Please contact this office with any questions.

Sincerely,

Cheyenne Aguilera
Office Manager

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2118

SUNTHURST ENERGY, LLC,

Complainant

vs.

PACIFICORP dba PACIFIC POWER,

Respondent.

MOTION FOR PROTECTIVE ORDER

In accordance with ORCP 36(C)(1), OAR 860-001-0080, and OAR 860-001-0420 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. Good cause exists to issue a Protective Order to protect PacifiCorp’s critical energy infrastructure, commercially sensitive and confidential business information produced in this docket.

In support of this Motion, the Company states:

1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business and customer information. *See* 860-001-0080; 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 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. On September 29, 2020, Sunthurst Energy, LLC filed a Complaint and subsequently issued discovery to PacifiCorp. Certain documents responsive to data requests may contain confidential material, including but not limited to critical energy infrastructure information. Public disclosure of the confidential information would be detrimental to PacifiCorp and its customers.

For the foregoing reasons, PacifiCorp requests entry of a standard protective order in this docket.

DATED: October 7, 2020.

MCDOWELL RACKNER GIBSON PC



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