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October 17, 2022

**VIA ELECTRONIC FILING**

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

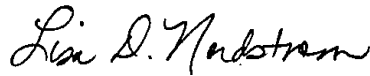
Re: Docket No. UM 2196  
Idaho Power Company's 2021 Distribution System Plan

Attention Filing Center:

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

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

Very truly yours,



Lisa D. Nordstrom

LDN/sg

Enclosure

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 2196**

4 In the Matter of Idaho Power Company's  
5 Distribution System Planning Report.

MOTION FOR PROTECTIVE ORDER

6 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho  
7 Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's  
8 ("Commission") general protective order in this proceeding. Good cause exists to issue a  
9 Protective Order to protect commercially sensitive and confidential business information that is  
10 considered to be of a trade secret, privileged or confidential nature.

11 In support of this Motion, the Company states:

12 1. The Commission's rules authorize reasonable restrictions on discovery of trade  
13 secrets and other confidential business information. See 860-001-0080; ORCP 36(C)(7)  
14 (providing protection against unrestricted discovery of "trade secrets or other confidential  
15 research, development, or commercial information"). See also *In re Investigation into the Cost*  
16 *of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991)  
17 (recognizing that protective orders are a reasonable means to protect "the rights of a party to  
18 trade secrets and other confidential commercial information" and "to facilitate the  
19 communication of information between litigants").

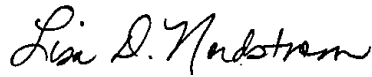
20 2. On August 15, 2022, Idaho Power filed Part 2 of its Distribution System Planning  
21 Report. On October 18, 2022, Idaho Power will file its responses to Staff's Data Request Nos.  
22 1-14 that contain confidential material concerning small area studies. Public disclosure of the  
23 confidential information could be detrimental to Idaho Power and its respective customers.

24 3. It is likely that Staff and others in this business proceeding will seek to discover  
25 confidential business information. "The Commission's standard blanket protective order is  
26 designed to facilitate discovery in cases involving discovery of large numbers of documents."

1 See *In re Portland Extended Area Service Region*, Docket No. UM 261, Order No. 91 -958  
2 (1991). Issuance of a protective order will facilitate the production of relevant information and  
3 expedite the discovery process.

4 For the foregoing reasons, Idaho Power request entry of a standard Protective Order  
5 in this docket.

6 DATED: October 17, 2022

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10 Lisa Nordstrom (OSB # 973528)  
11 Attorney for Idaho Power Company  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2022, I served a true and correct copy of Idaho Power Company’s Motion for Protective Order by e-mail to said person(s) as indicated below.

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DATED: October 17, 2022.



Stacy Gust, Regulatory Administrative Assistant