



825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

October 18, 2022

VIA ELECTRONIC FILING

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

Re: UM 2198—PacifiCorp's Motion for General Protective Order

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

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

Sincerely,

Shelley McCoy
Director, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2198**

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Oregon Distribution System Plan Report.

**PACIFICORP’S MOTION FOR A
GENERAL PROTECTIVE ORDER**

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and Oregon Administrative Rule (OAR) 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) moves the Public Utility Commission of Oregon (Commission) for entry of a general protective order in this proceeding. On October 15, 2021, PacifiCorp filed Part 1 of its Oregon Distribution System Plan Report, initiating the above referenced docket. On August 15, 2022, the Company filed Part 2 of its Oregon Distribution System Plan Report. On October 5, 2022, the Company received data requests in this proceeding that include requests for information that is considered confidential. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to the Company’s responses to discovery.

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

¹ See OAR 860-001-0080(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”).

the need to protect confidential information.² Parties may request commercially sensitive load information, including projections, confidential third party information that the Company is contractually bound to keep confidential, confidential market analyses and business projections to conduct their analysis of the Company's Oregon Distribution System Planning Report. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its 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 18th day of October 2022.



Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Phone: (503) 813-6338
Email: carla.scarsella@pacificorp.com

² OAR 860-001-0080(2).