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July 2, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UW 181 – Avion Water Company, Inc.’s Application for a General Rate Revision

Attached for filing in the above-captioned docket is Avion Water Company, Inc.’s Motion for General Protective Order, expedited consideration requested.

Please contact this office with any questions.

Thank you,

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UW 181

In the Matter of

AVION WATER COMPANY, INC.

Application for a General Rate Revision.

MOTION FOR PROTECTIVE ORDER

(Expedited Consideration Requested)

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Avion Water Company, Inc.
2 (“Avion” or the “Company”) moves for the entry of the Public Utility Commission of Oregon’s
3 (“Commission”) general protective order in this proceeding. Good cause exists to issue a
4 protective order to protect commercially sensitive and confidential business information related
5 to the Company’s general rate case. Because the Company has filed its rate case today, Avion
6 requests that the general protective order be entered on an expedited basis.

7 In support of this Motion, the Company states:

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

16 2. On July 2, 2020, Avion filed its application for a general rate case. Certain
17 documents related to the filing include confidential material, including confidential employee
18 data. Public disclosure of the confidential information could be detrimental to Avion and its
19 customers.

1 3. It is substantially likely that Staff and others in this proceeding will seek to
2 discover confidential business information. "The Commission's standard blanket protective order
3 is designed to facilitate discovery in cases involving discovery of large numbers of documents."
4 See *In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).
5 Issuance of a protective order will facilitate the production of relevant information and expedite
6 the discovery process.

7 4. Avion requests consideration of this Motion to allow parties who execute the
8 protective order to obtain prompt access to the confidential information that will be submitted in
9 support of the Company's request for a general rate increase and to expedite discovery in this
10 proceeding.

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

DATED: July 2, 2020.

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