

TOMMY A. BROOKS
ADMITTED IN OREGON AND WASHINGTON

tbrooks@cablehuston.com www.cablehuston.com

March 1, 2023

VIA E-FILING

Public Utility Commission of Oregon Attn: Filing Center 201 High Street SE Suite 100 Post Office Box 1088 Salem, Oregon 97308-1088

> Re: Docket No. UW 194– In the Matter of Crooked River Ranch Water Company Motion for General Protective Order – Expedited Consideration Requested

Dear Filing Center:

Attached for filing in docket UW 194 is Crooked River Ranch Water Company's motion for a general protective order.

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,

Tommy A. Brooks

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UW 194

In the Matter of

CROOKED RIVER RANCH

WATER COMPANY

REQUEST FOR A GENERAL

RATE REVISION

CROOKED RIVER RANCH WATER COMPANY'S MOTION FOR A GENERAL PROTECTIVE ORDER

EXPEDITED CONSIDERATION REQUESTED

Under ORCP 36(C)(7) and OAR 860-001-0080(1), Crooked River Ranch Water Company ("Company") moves the Public Utility Commission of Oregon ("Commission") for entry of a general protective order in these proceedings to protect certain confidential information. The Company's rate filing includes confidential information in a redacted format. The Company requests expedited consideration of this motion in order to promptly provide confidential information to the Commission in an unredacted format.

Good cause exists to issue a protective order to protect personally sensitive, commercially sensitive, and confidential business information related to the Company's filing.

The Commission's rules authorize the Company to seek reasonable restrictions on discovery of trade secrets and other confidential business information. The Commission's general protective order is designed to allow the broadest possible discovery consistent

with the need to protect confidential information.¹ The information is confidential and commercially sensitive, and constitutes "Protected Information," because it includes personally identifiable wage and salary information.

It is also possible that the parties to these proceedings will seek to discover further information held by the Company, including confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

For these reasons, the Company respectfully requests that the Commission enter its general protective order in this docket.

DATED this 1st day of March 2023.

Respectfully submitted,

/s/ Tommy Brooks

Tommy A. Brooks, OSB No. 076071 Cable Huston LLP 1455 SW Broadway, Suite 1500 Portland, OR 97204-1136 Telephone: (503) 224-3092

E-Mail: tbrooks@cablehuston.com

Of Attorneys for Crooked River Ranch Water Company

¹ See OAR 860 001-0000(1) (adopting the Oregon Rules of Civil Procedure), ORCP 36(C)(7) (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 party to trade secrets and other confidential commercial information" and "to facilitate the communications of information between litigants").