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Attorneys for the
Oregon Industrial Customers of Idaho Power

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of IDAHO POWER COMPANY)
Request for General Rate Revision) UE 233
)
) MOTION FOR QUALIFICATION
) UNDER MODIFIED PROTECTIVE
) ORDER

The Oregon Industrial Customers of Idaho Power (“OICIP”) hereby moves the Public Utility Commission of Oregon (“Commission”) to qualify the OICIP’s representatives as qualified persons under the Modified Protective Order approved in Order No. 11-398. OICIP files this motion pursuant to paragraph 12 of the Modified Protective Order, and in support thereof states as follows:

(a) The OICIP is an unincorporated association of Schedule 19 customers of Idaho Power Company in Oregon. The Commission granted the OICIP intervenor status in this case, and the OICIP intends to fully participate in these proceedings by filing testimony; participating in settlement negotiations, workshops, conferences, and hearings; and filing other pleadings as required. The purpose of the OICIP is to ensure its members receive high electricity service quality and cost-of-service electricity rates. OICIP, its members, and representatives are not in competition with Idaho Power Company, and will use the Highly Confidential Information for a non-competitive purpose – to participate and advocate in this general rate case. The OICIP member companies are customers of Idaho Power. These customers may suffer potential harm if not allowed to receive the Highly Confidential Information relevant to this proceeding because review of all information relevant to the rate case filing is necessary to adequately advocate on behalf of OICIP. This is not simply a general interest in the materials.

(b) The legitimate need identified outweighs the potential for competitive harm to Idaho Power Company resulting from disclosure. The risk of disclosure to Idaho Power Company's competitors is low because only OICIP's representatives will sign the Modified Protective Order and have access to the protected information. Also, OICIP, its members, and representatives are not in competition with Idaho Power Company.

Accordingly, the representatives of the Oregon Industrial Customers of Idaho Power, Peter J. Richardson, Gregory M. Adams, and Dr. Don Reading, are qualified persons under paragraphs 4(f) and 14 of the Modified Protective Order, and have executed the Consent to be Bound Form of the Modified Protective Order enclosed with this filing.

DATED this 11th day of September 2011.

RICHARDSON & O'LEARY, PLLC



Gregory M. Adams
OSB No. 101779
Attorneys for the Oregon
Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of October, 2011, a true and correct copy of the within and foregoing **MOTION FOR QUALIFICATION UNDER MODIFIED PROTECTIVE ORDER OF THE OREGON INDUSTRIAL CUSTOMERS OF IDAHO POWER** was served as follows:

CHRISTA BEARRY
LISA D NORDSTROM
IDAHO POWER COMPANY
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BOISE ID 83707-0070
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lnordstrom@idahopower.com

Hand Delivery
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 Facsimile
 Electronic Mail

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ASSISTANT ATTORNEY GENERAL
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BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

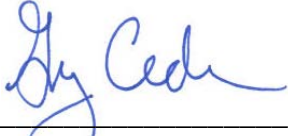
Hand Delivery
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 Facsimile
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JUDY JOHNSON (C)
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judy.johnson@state.or.us
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 Facsimile
 Electronic Mail

Signed 

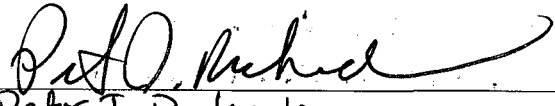
Gregory M. Adams

SIGNATORY PAGE
DOCKET NO. UE 233

I. Consent to be Bound

This Modified Protective Order governs the use of "Confidential Information" and "Highly Confidential Information" in this proceeding.

OICIP (Party) agrees to be bound by its terms of this Modified Protective Order.

By: Signature: 
Printed Name: Peter J. Richardson
Date: 10/16/11

II. Persons Qualified pursuant to Paragraphs 4(a), (b), (d), and (e): Confidential Information

OICIP (Party) identifies the following person(s) automatically qualified under paragraph 4(a), (b), (d), and (e).

PRINTED NAME	DATE
<u>Peter J. Richardson</u>	<u>10/16/11</u>
<u>Gregory Adams</u>	

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III. Persons Qualified pursuant to Paragraph (4)(c) and (f) and Paragraph 14: Confidential Information

I have read the Modified Protective Order, agree to be bound by the terms of the order, and will provide the information identified in paragraph 14.

By: Signature: [Handwritten Signature] Date: 10/10/2011
Printed Name: DON C. READING
Address: 6020 Hill Road, Boise, ID
Employer: BEN THOMSON ASSO.
Job Title: Economist

Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____
Printed Name: _____
Address: _____
Employer: _____
Job Title: _____

Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____
Printed Name: _____
Address: _____
Employer: _____
Job Title: _____

Paragraph 10(e) information also provided.

By: Signature: _____ Date: _____
Printed Name: _____
Address: _____
Employer: _____
Job Title: _____

Paragraph 10(e) information also provided.

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**Oregon Industrial Customers of Idaho Power
Paragraph 14(e) Information**

Description Dr. Don Reading's Consulting Practice:

Dr. Don Reading is employed as a consulting economist and Vice President of Ben Johnson Associates, 6070 Hill Road, Boise, Idaho 83703. Ben Johnson Associates, Inc. serves a wide range of governmental and private sector clients involved in public utility regulation. In the public sector, the firm has provided consulting assistance to state regulatory commissions as well as other government agencies that are routine participants in the regulatory process, including attorneys general and public counsels. The firm has also worked for public agencies, including state, city and county government entities. In the private sector, the firm has worked for law firms, privately held and publicly owned corporations, and non-profit groups and associations.

Clients include: Regulatory Commission of Alaska, Arizona Corporation Commission, Arizona Residential Utility Consumer Office, District of Columbia Public Service Commission, Georgia Public Service Commission, Idaho Public Utilities Commission, Nevada Public Service Commission, North Carolina Utilities Commission, Texas Public Utilities Commission, Washington Utilities and Transportation Commission, Wyoming Public Service Commission, Eagle, Idaho, El Paso, Texas, Florida Department of General Services, Idaho Department of Fish & Game, Idaho Department of Parks and Recreation, Idaho Department of Transportation, Idaho Special Committee on Electric Utility Restructuring, Idaho State Board of Education, Idaho State Tax Commission, Kuna School District, Office of the Governor of Idaho, State of Utah Property Tax Division, United States Department of Justice, Antitrust Division, Utah Department of Business Regulation - Committee of Consumer Services, Boise State University, Helca Mining Company, J.R. Simplot Company, Micron Semi-Conductor, Inc., Montana Power Company, Northern Lights Public Utility, Otter-Tail Power Company, RDO Foods Company, Richard Slaughter Associates, Inc., Pioneer Canal Company, Rosebud Enterprises, Inc., Skokomish Indian Tribe, Twin Falls Canal Company, Jerome Cheese Company, American Ecology, Inc.