



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

December 30, 2019

VIA ELECTRONIC FILING

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

Attn: Filing Center

**Re: UM ____—PacifiCorp 2021-2023 Oregon Renewable Portfolio Standard
Implementation Plan—Motion for Protective Order—Expedited Treatment
Requested**

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for General Protective Order with Expedited Treatment Requested. The entry of a general protective order will prevent delay in providing availability of confidential information when PacifiCorp files its 2021-2023 Oregon Renewable Portfolio Standard Implementation Plan on or before December 31, 2019, in compliance with ORS 469A.075 and OAR 860-083-0400.

If you have questions about this filing, please contact Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

2021-2023 Oregon Renewable Portfolio
Standard Implementation Plan

MOTION FOR GENERAL
PROTECTIVE ORDER

**EXPEDITED TREATMENT
REQUESTED**

Under ORCP 36(C)(1) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power moves the Public Utility Commission of Oregon (Commission) for entry of a general protective order in this proceeding. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to PacifiCorp’s procurement of resources necessary to comply with Oregon’s renewable portfolio standard (RPS).

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 the need to protect confidential information.² PacifiCorp expects to receive discovery requests in these proceedings, including requests for propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, or confidential information regarding contracts for the purchase or sale of

¹ See OAR 860-001-0000(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”).

² OAR 860-001-0080(2).

electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

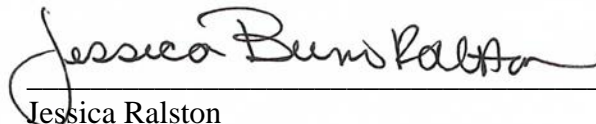
It is also substantially likely that the parties to these proceedings will seek to discover further information held by PacifiCorp, including confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

PacifiCorp seeks expedited treatment of this motion to prevent any delay in providing availability of confidential information when the company provides its 2021-2023 Oregon Renewable Portfolio Standard Implementation Plan in this docket on or before December 31, 2019.

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

Respectfully submitted this 30th day of December, 2019

By:



Jessica Ralston
Senior Attorney
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Phone: (503) 813-5817
Email: Jessica.Ralston@PacifiCorp.com