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Portland, Oregon 97232

December 5, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3389

Attn: Filing Center

RE: Docket LC___ – PacifiCorp’s 2017 Integrated Resource Plan—Motion for General Protective Order – Expedited Consideration Requested

PacifiCorp d/b/a Pacific Power (Company) intends to file an Integrated Resource Plan (IRP) on or about March 31, 2017. Prior to the filing, the Company intends to provide confidential information to interested parties. Accordingly, the Company requests the Commission open a docket for the Company’s 2017 IRP and grant the enclosed motion for a general protective order.

As indicated on the attached service list, a copy of this filing is being served to all parties on the service list for the Company’s 2015 IRP.

Please direct inquiries to Natasha Siores at (503) 813-6583.

Sincerely,

A handwritten signature in black ink that reads "R. Bryce Dalley". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

R. Bryce Dalley
Vice President, Regulation

Enclosure

cc: Service List – LC 62

CERTIFICATE OF SERVICE

I certify that I electronically filed a true and correct copy of PacifiCorp's 2017 Integrated Resource Plan – Motion for General Protective Order on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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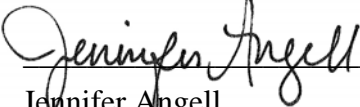
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Dated this 5th day of December 2016.

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Jennifer Angell
Supervisor, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC ____

In the Matter of
PACIFICORP d/b/a PACIFIC POWER's,
2017 Integrated Resource Plan.

MOTION FOR GENERAL
PROTECTIVE ORDER

Expedited Consideration Requested

Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for entry of a general protective order in this proceeding. The Company will file its 2017 Integrated Resource Plan (IRP) on or about March 31, 2017. The Company requests expedited consideration of this motion to facilitate IRP workshops scheduled for December 15 and 16, 2016, where confidential information will be provided to stakeholders. Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information related to the Company's long-term resource planning.

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 will be holding stakeholder workshops where

¹ See OAR 860-001-0000(1) (adopting the ORCP); 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 trade secrets and other confidential commercial information and "to facilitate the communication of information between litigants").

² OAR 860-001-0080(2).

proprietary cost data and models, commercially sensitive pricing information, and confidential market analyses and business projections will be discussed. 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 parties to this proceeding will seek to discover further information held by PacifiCorp after the 2017 IRP is filed on or about March 31, 2017, including confidential and proprietary 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. The Company requests expedited consideration of this motion to allow stakeholders who execute the protective order to participate in confidential workshops scheduled for December 15 and 16, 2016.

Respectfully submitted this 5th day of December 2016.

By:  _____

Erin Apperson
Legal Counsel
PacifiCorp d/b/a Pacific Power