



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

November 27, 2017

VIA ELECTRONIC FILING

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

Attn: Filing Center

**Re: UM ____ – PacifiCorp Resource Value of Solar – Motion for Protective Order –
Expedited Consideration Requested**

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for General Protective Order. In compliance with Order No. 17-357, PacifiCorp will make its Resource Value of Solar filing on November 30, 2017.

Please direct any informal correspondence and questions regarding this filing to Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Resource Value of Solar

MOTION FOR GENERAL
PROTECTIVE ORDER
**EXPEDITED TREATMENT
REQUESTED**

Under ORCP 36(C)(7) 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 in this proceeding.

The Commission's rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission's standard 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 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.

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 a party to trade secrets and other confidential commercial information" and "to facilitate the communication of information between litigants").

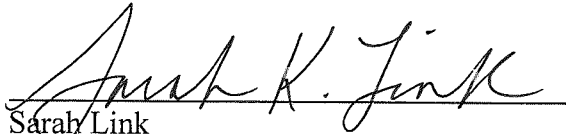
² OAR 860-001-0080(2).

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 resource value of solar filing in this docket on November 30, 2017.

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

Respectfully submitted this 27th day of November, 2017.

A handwritten signature in black ink, appearing to read "Sarah K. Link", written over a horizontal line.

Sarah Link
Vice President and General Counsel
PacifiCorp d/b/a Pacific Power