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March 14, 2005

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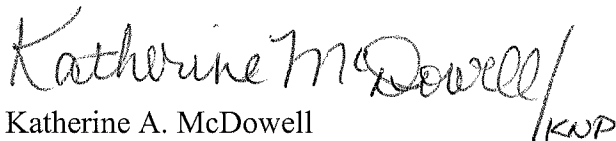
VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

**Re: PacifiCorp's Motion for Protective Order
Docket LC 39**

Enclosed for filing is PacifiCorp's Motion for Protective Order in the above-referenced docket. A hard copy was served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,


Katherine A. McDowell /KMP

KAM:knp
Enclosure
cc: Service List

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

LC 39

In the Matter of PACIFICORP 2004
Integrated Resource Plan

MOTION FOR PROTECTIVE ORDER

Pursuant to OAR 860-12-0035(1)(k), PacifiCorp moves for entry of the Commission’s standard protective order in this proceeding. As good cause for this motion, PacifiCorp states:

1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information. The Commission has adopted the Oregon Rules of Civil Procedure. OAR 860-11-0000(3). ORCP 36(C)(7) provides protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information.”

The Commission has recognized 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.” *In re Investigation into the Cost of Providing Telecommunication Service (UM 351)*, Order No. 91-500 (1991).

2. PacifiCorp anticipates that discovery in this proceeding may include 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 or power services. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

3. There is a substantial likelihood that Staff and others in this proceeding will seek to discover confidential business information from PacifiCorp. Issuance of a protective

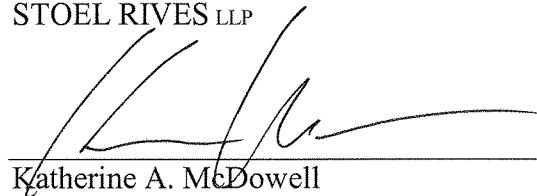
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1 order will facilitate the production of relevant information and expedite the discovery
2 process.

3 For all the foregoing reasons, PacifiCorp requests entry of the Commission's standard
4 protective order in this docket.

5 DATED: March 14, 2005.

6 STOEL RIVES LLP

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Katherine A. McDowell

9 Attorneys for PacifiCorp
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document in docket LC 39 on the following named person(s) on the date indicated below by

- mailing with postage prepaid
- hand delivery
- facsimile transmission
- overnight delivery

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

Phil Carver
Oregon Department of Energy
625 Marion Street NE, Suite 1
Salem, OR 97301-3742

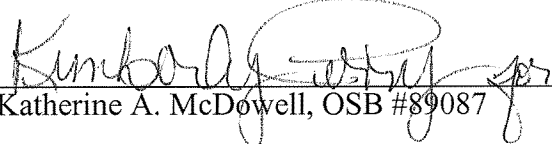
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DATED: March 14, 2005.



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 Of Attorneys for PacifiCorp

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