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October 1, 2009

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
550 Capital Street NE, Ste. 215
Salem, OR 97301-2551

Attn: Filing Center

RE: Docket LC 47 – Motion for Protective Order

Please find enclosed the original and one copy of its Motion for Protective Order in the above referenced matter. A copy of this filing was served on all parties to this proceeding as indicated on the attached service list.

Please direct any informal inquiries to Joelle Steward, Regulatory Manager, at (503) 813-5542.

Sincerely,

A handwritten signature in black ink that reads "Andrea L. Kelly / SAW".

Andrea L. Kelly
Vice President, Regulation

cc: Service List LC 47

CERTIFICATE OF SERVICE

I certify that I have cause to be served the foregoing **Motion for Protective Order** in OPUC Docket No. LC 47 by electronic mail and US mail to those parties who have not waived paper service on the attached service list.

DATED this 1st day of October, 2009.

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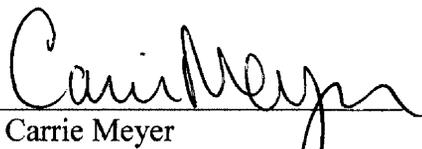
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Carrie Meyer
Coordinator, Regulatory Operations

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

LC 47

In the Matter of
PACIFICORP, dba PACIFIC POWER
2008 Integrated Resource Plan

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(7) and OAR 860-012-0035(1)(k), PacifiCorp d/b/a Pacific
2 Power (“Company”) moves for entry of the Commission’s standard protective order in this
3 proceeding.

4 In support of this Motion, the Company states:

5 1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions
6 on discovery of sensitive commercial information and other confidential business
7 information. *See* OAR 860-11-000(3) (adopting Oregon Rules of Civil Procedure
8 (“ORCP”); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade
9 secrets or other confidential research, development, or commercial information”). *See also*
10 *In re Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351,
11 Order No. 91-500 (1991) (recognizing that protective orders are a reasonable means to
12 protect “the rights of a party to trade secrets and other confidential commercial
13 information” and “to facilitate the communication of information between litigants”).

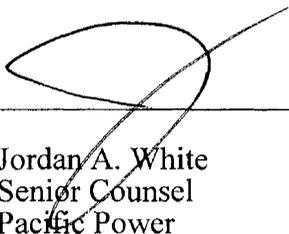
14 2. The Company anticipates that parties to this docket may request detailed
15 information regarding PacifiCorp’s integrated resource planning process. The Company
16 further anticipates that discovery in this proceeding may include, among other things,
17 requests for production of commercially-sensitive load and resource projections,

1 information covered by confidentiality agreements, and other confidential analyses. This
2 confidential business information is of significant commercial value, which could expose
3 the Company and counter-parties to competitive injury if disclosure is unrestricted.

4 3. It is substantially likely that Staff and others parties in this proceeding will
5 seek to discover a large amount of information held by PacifiCorp, including confidential
6 business information. “The Commission’s standard blanket protective order is designed to
7 facilitate discovery in cases involving discovery of large numbers of documents.” *See In re*
8 *Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).
9 Issuance of a protective order will facilitate the production of relevant information and
10 expedite the discovery process.

11 For the foregoing reasons, PacifiCorp requests entry of the Commission’s standard
12 protective order in this docket.

DATED: October 1, 2009.



Jordan A. White
Senior Counsel
Pacific Power

Attorney for PacifiCorp