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June 9, 2011

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

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

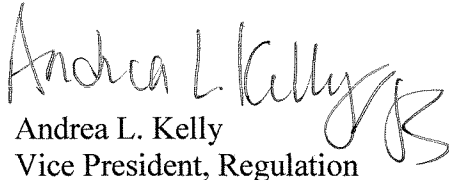
Attn: Filing Center

RE: LC 52 – Pacific Power’s Motion for a Protective Order

PacifiCorp d/b/a Pacific Power (“Company”) encloses for filing its Motion for a Protective Order in the above-referenced proceeding. As indicated on the attached service list, a copy of this filing is being served to all parties on the service list.

Please contact Joelle Steward, Regulatory Manager, at (503) 813-5542, for questions on this matter.

Sincerely,


Andrea L. Kelly
Vice President, Regulation

Enclosure

cc: Service List – LC 52

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document, on the date indicated below by email and/or US Mail, addressed to said parties at his or her last-known address(es) indicated below.

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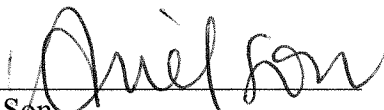
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Dated: June 9, 2011


Ariel Son
Coordinator, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 52

In the Matter of
PACIFICORP dba PACIFIC POWER
2011 Integrated Resource Plan.

MOTION FOR PROTECTIVE ORDER

1 Pursuant to OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (Company)
2 moves for the entry of the Public Utility Commission of Oregon’s (Commission) general
3 protective order in this proceeding. As good cause for this motion, PacifiCorp states:

4 1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions
5 on discovery of trade secrets and other confidential business information. *See* OAR 860-001-
6 0080(3) (allowing confidential designation of information that is protected under Oregon
7 Rule of Civil Procedure 36(C)(7) or is exempt from public disclosure under the Public
8 Records Law). *See also Re Investigation into the Cost of Providing Telecommunication*
9 *Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing that protective orders are a
10 reasonable means to protect “the rights of a party to trade secrets and other confidential
11 commercial information” and “to facilitate the communication of information between
12 litigants”).

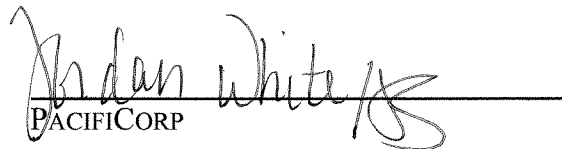
13 2. The Company anticipates that parties to this docket may request proprietary
14 cost data and models, commercially sensitive load and resource projections, and confidential
15 market analyses and business projections. This confidential business information is of
16 significant commercial value, which could expose the Company to competitive injury if
17 disclosure is unrestricted.

18 3. It is substantially likely that Staff and others in this proceeding will seek to
19 discover a large amount of information held by PacifiCorp, including confidential business

1 information. “The Commission’s standard blanket protective order is designed to facilitate
2 discovery in cases involving discovery of large numbers of documents.” *See In re Portland*
3 *Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991). Issuance of a
4 protective order will facilitate the production of relevant information and expedite the
5 discovery process.

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

DATED: June 9, 2011



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