

March 20, 2013

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

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

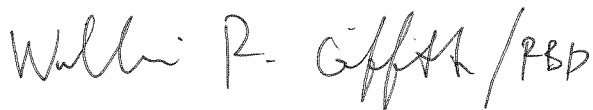
Attn: Filing Center

**RE: LC ___—2013 Integrated Resource Plan
Request to Open a Docket and Motion for Protective Order**

PacifiCorp d/b/a Pacific Power (Company) intends to file an Integrated Resource Plan (IRP) on April 30, 2013. Prior to filing, the Company intends to provide confidential information to interested parties. Accordingly, the Company requests the Commission open a docket for the Company's 2013 IRP and grant the enclosed motion for a 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 last IRP.

Please direct inquiries to Bryce Dalley, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,



William R. Griffith
Vice President, Regulation

Enclosure

cc: Service List – LC 52

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC _____

In the Matter of
PACIFICORP D/B/A PACIFIC POWER
2013 Integrated Resource Plan.

MOTION FOR PROTECTIVE ORDER

1 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power
2 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for
3 entry of a standard protective order in this proceeding. The Company will file its 2013
4 Integrated Resource Plan on April 30, 2013. Good cause exists to issue a protective order to
5 protect commercially sensitive and confidential business information related to the
6 Company’s long-term resource planning.

7 The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on
8 discovery of trade secrets and other confidential business information.¹ The Commission’s
9 standard protective order is designed to allow the broadest possible discovery consistent with
10 the need to protect confidential information.² PacifiCorp expects to receive discovery
11 requests in these proceedings, including requests for proprietary cost data and models,
12 commercially sensitive pricing information, and confidential market analyses and business
13 projections. This confidential business information is of significant commercial value, which
14 could expose the Company to competitive injury if disclosure is unrestricted.

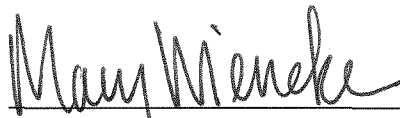
¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information”). See also *In re Investigation into the Cost of Providing Telecommunication 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).

1 It is substantially likely that the parties to these proceedings will seek to discover
2 further information held by PacifiCorp, including confidential business information.
3 Issuance of a protective order will facilitate the production of relevant information and
4 expedite the discovery process.

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

Respectfully submitted this 20th day of March, 2013.

A handwritten signature in black ink that reads "Mary Wiencke". The signature is written in a cursive style and is positioned above a horizontal line.

Mary Wiencke
Senior Counsel
PacifiCorp d/b/a Pacific Power

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the Motion for Protective Order, 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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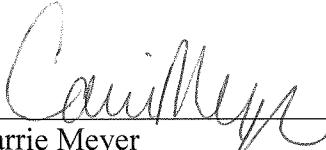
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Dated: March 20, 2013



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