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September 12, 2013

VIA ELECTRONIC AND U.S. MAIL

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

Re: Docket LC 58 - Idaho Power Company's 2013 Integrated Resource Plan ("IRP")

Enclosed for filing in the above-identified docket are an original and two copies of Idaho Power Company's Motion for Protective Order.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached Certificate of Service.

Please contact this office with any questions.

Very truly yours,

Wendy McIndoo
Office Manager

cc: Service List

Enclosures

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **LC 58**

3 In the Matter of
4 IDAHO POWER COMPANY
5 2013 Integrated Resource Plan.
6 _____

MOTION FOR PROTECTIVE ORDER

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8 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company (“Idaho
9 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s
10 (“Commission”) general protective order in this proceeding. Good cause exists to issue a
11 Protective Order to protect commercially sensitive and confidential business information
12 related to the Company’s 2013 Integrated Resource Plan (“IRP”).

13 In support of this Motion, the Company states:

14 1. The Commission’s rules authorize Idaho Power to seek reasonable restrictions
15 on discovery of trade secrets and other confidential business information. See 860-001-0080;
16 ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other
17 confidential research, development, or commercial information”). See also *In re Investigation*
18 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
19 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a
20 party to trade secrets and other confidential commercial information” and “to facilitate the
21 communication of information between litigants”).

22 2. On June 28, 2013, Idaho Power filed its 2013 IRP. Idaho Power anticipates that
23 discovery in this proceeding will include requests for proprietary business and financial
24 information. Idaho Power will be exposed to competitive injury if it is forced to make
25 unrestricted disclosure of its confidential business information. “The Commission’s standard
26 blanket protective order is designed to facilitate discovery in cases involving discovery of large

1 numbers of documents." See *In re Portland Extended Area Service Region*, Docket UM 261,
2 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of
3 relevant information and expedite the discovery process.

4 For the foregoing reasons, Idaho Power requests entry of a standard Protective Order
5 in this docket.

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8 DATED: September 12, 2013.

McDOWELL RACKNER & GIBSON PC



9
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27 Attorneys for Idaho Power Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing documents in
3 Docket LC 58 on the following named persons on the date indicated below by e-mail
4 addressed to said persons at his or her last-known address indicated below.

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DATED: September 12, 2013

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