

**Avista Corp.**

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October 22, 2014

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

**RE: LC 61 – Avista’s Motion for a General Protective Order (Expedited Consideration Requested)**

Avista Utilities 2014 Integrated Resource Plan. The Company has been requested to file confidential information in discovery, therefore, enclosed is a Motion for a General Protective Order.

Please direct any questions regarding this filing to Linda Gervais at (509) 495-4975.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Meyer", with a horizontal line extending to the right.

David J. Meyer  
Chief Counsel for Regulatory and Governmental Affairs

Enclosure

cc: See attached service list

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

LC-61

In the matter of	)	MOTION FOR PROTECTIVE ORDER
AVISTA CORPORATION, DBA	)	
AVISTA UTILITIES,	)	<b>Expedited Consideration Requested</b>
	)	
<u>2014 Integrated Resource Plan.</u>	)	

1 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080(1), Avista Corporation, d/b/a Avista  
2 Utilities (“Company”), moves for entry of the Commission’s standard protective order in this  
3 proceeding. The Company requests expedited consideration of this Motion in order to allow parties  
4 that execute the protective order to obtain prompt access to the confidential discovery in this  
5 proceeding. Good cause exists to issue a Protective Order to protect commercially sensitive and  
6 confidential business information related to the Company’s Integrated Resource Plan. In support of  
7 this Motion, the Company states:

8

9

1.

10 The Commission’s rules authorize Avista to seek reasonable restrictions on discovery of  
11 sensitive commercial information and other confidential business information. See OAR 860-001-  
12 0080(3)(a) (adopting Oregon Rules of Civil Procedure (“ORCP”)); ORCP 36(C)(7) (providing  
13 protection against unrestricted discovery of “trade secrets or other confidential research,  
14 development, or commercial information”). See also *In re Investigation into the Cost of Providing*  
15 *Telecommunication Service* (UM 351), Order No. 91-500 (1991) (recognizing that protective orders  
16 are a reasonable means to protect “the rights of a party to trade secrets and other confidential

1 commercial information” and “to facilitate the communication of information between litigants”).

2

3 2.

4 Avista anticipates that parties to this docket may request proprietary cost data and models,  
5 commercially sensitive load and resource projections, confidential market analyses and business  
6 projections, and confidential information regarding contracts for the purchase or sale of natural gas.  
7 This confidential business information is of significant commercial value, which would expose the  
8 Company to competitive injury if disclosure is unrestricted.

9

10 3.

11 It is substantially likely that Staff and other parties in this proceeding will seek to discover  
12 information held by Avista, including confidential business information. “The Commission’s  
13 standard blanket protective order is designed to facilitate discovery in cases involving discovery of  
14 large numbers of documents.” *See In re Portland Extended Area Service Region*, Docket UM 261,  
15 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of relevant  
16 information and expedite the discovery process.

17

18 4.

19 The Company requests expedited consideration of this Motion to allow parties who execute  
20 the protective order to obtain prompt access to any confidential discovery in this proceeding.

21 5.

22 Counsel for Avista has contacted counsel for Staff, CUB and NWIGU, and none oppose this  
23 motion.

1

2           For the foregoing reasons, Avista requests expedited entry of the Commission's standard  
3 protective order in this docket.

DATED: October 22, 2014.



\_\_\_\_\_  
David J. Meyer  
Chief Counsel for Regulatory and Governmental Affairs  
Avista Corporation

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the Motion for Protective Order in the Integrated Resource Plan Filing of Avista Utilities, a division of Avista Corporation, (LC-61) upon the parties listed below by electronic mail.

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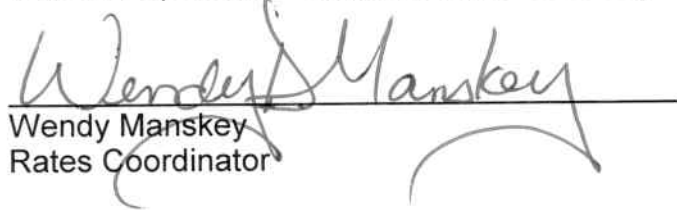
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I declare under penalty of perjury that the foregoing is true and correct.

Dated at Spokane, Washington this 22nd day of October 2014.

  
Wendy Manskey  
Rates Coordinator