

June 12, 2018

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

Attn: Filing Center

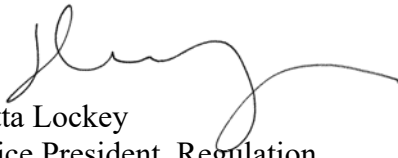
**RE: LC \_\_\_\_—PacifiCorp’s 2019 Integrated Resource Plan—Motion for General Protective Order—Expedited Consideration Requested**

PacifiCorp d/b/a Pacific Power intends to file an Integrated Resource Plan (IRP) on or about April 1, 2019. Before the filing, PacifiCorp intends to provide confidential information to interested parties. Accordingly, PacifiCorp requests the Public Utility Commission of Oregon open a docket for the company’s 2019 IRP and grant the enclosed motion for a general 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 PacifiCorp’s 2017 IRP.

Please direct any inquiries about this filing to Natasha Siores at (503) 813-6583.

Sincerely,

  
Etta Lockey  
Vice President, Regulation

Enclosure

cc: Service List – LC 67

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC \_\_\_\_

In the Matter of  
PACIFICORP d/b/a PACIFIC POWER's  
2019 Integrated Resource Plan.

MOTION FOR GENERAL  
PROTECTIVE ORDER

*Expedited Consideration Requested*

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power moves the Public Utility Commission of Oregon (Commission) for entry of a general protective order in this proceeding. PacifiCorp will file its 2019 Integrated Resource Plan (IRP) on or about April 1, 2019. PacifiCorp requests expedited consideration of this motion to facilitate its 2019 IRP public input meetings beginning June 28–29, 2018. During the IRP public input meetings, PacifiCorp may present confidential information to stakeholders. Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information related to the company's long-term resource planning.

The Commission's rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission's general protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.<sup>2</sup> PacifiCorp will be holding stakeholder

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<sup>1</sup> 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").

<sup>2</sup> OAR 860-001-0080(2).

workshops where proprietary cost data and models, commercially sensitive pricing information, and confidential market analyses and business projections will be discussed. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

It is also substantially likely that parties to this proceeding will seek to discover further information held by PacifiCorp after the 2019 IRP is filed on or about April 1, 2019, including confidential and proprietary business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

For these reasons, PacifiCorp respectfully requests that the Commission enter its general protective order in this docket. PacifiCorp respectfully requests expedited consideration of this motion to allow stakeholders who execute the protective order to participate in confidential public input meetings starting on June 28–29, 2018.

Respectfully submitted this 12<sup>th</sup> day of June, 2018.

By:   
Matthew McVee, OSB #020735  
Chief Regulatory Counsel  
PacifiCorp  
825 NE Multnomah Street, Suite 1800  
Portland, OR 97232  
PHONE: (503) 813-5585  
EMAIL: [matthew.mcvee@pacificorp.com](mailto:matthew.mcvee@pacificorp.com)

## CERTIFICATE OF SERVICE

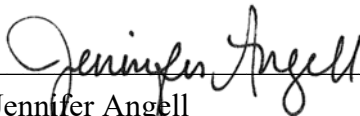
I certify that I electronically filed a true and correct copy of PacifiCorp's **MOTION FOR GENERAL PROTECTIVE ORDER** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

### Service List LC 67

<b>ALLIANCE OF WESTERN ENERGY CONSUMERS</b>	
TYLER C PEPPLER (C)	<a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a>
BRADLEY MULLINS (C)	<a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a>
<b>COALITION LC 67</b>	
NANCY ESTEB	<a href="mailto:esteb44@centurylink.net">esteb44@centurylink.net</a>
JOHN LOWE	<a href="mailto:jravenesanmarcos@yahoo.com">jravenesanmarcos@yahoo.com</a>
IRION A SANGER (C)	<a href="mailto:irion@sanger-law.com">irion@sanger-law.com</a>
<b>NATIONAL GRID</b>	
NATHAN SANDVIG	<a href="mailto:nathan.sandvig@nationalgrid.com">nathan.sandvig@nationalgrid.com</a>
JACK STODDARD	<a href="mailto:fjackson.stoddard@morganlewis.com">fjackson.stoddard@morganlewis.com</a>
<b>NIPPC LC 67</b>	
ROBERT D KAHN	<a href="mailto:rkahn@nippc.org">rkahn@nippc.org</a>
STEVE KNUDSEN (C)	<a href="mailto:sknudsen@nippc.org">sknudsen@nippc.org</a>
SIDNEY VILLANUEVA (C)	<a href="mailto:sidney@sanger-law.com">sidney@sanger-law.com</a>
<b>NW ENERGY COALITION</b>	
WENDY GERLITZ (C)	<a href="mailto:wendy@nwenergy.org">wendy@nwenergy.org</a>
FRED HEUTTE (C)	<a href="mailto:fred@nwenergy.org">fred@nwenergy.org</a>
<b>ODOE LC 67</b>	
DIANE BROAD (C)	<a href="mailto:diane.broad@state.or.us">diane.broad@state.or.us</a>
JESSE D. RATCLIFFE (C)	<a href="mailto:jesse.d.ratcliffe@doj.state.or.us">jesse.d.ratcliffe@doj.state.or.us</a>
WENDY SIMONS (C)	<a href="mailto:wendy.simons@oregon.gov">wendy.simons@oregon.gov</a>
<b>OREGON CITIZENS UTILITY BOARD</b>	
OREGON CITIZENS' UTILITY BOARD	<a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a>
MICHAEL GOETZ (C)	<a href="mailto:mike@oregoncub.org">mike@oregoncub.org</a>
ROBERT JENKS (C)	<a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>
<b>PACIFICORP</b>	
PACIFICORP, DBA PACIFIC POWER	<a href="mailto:oregondockets@pacificorp.com">oregondockets@pacificorp.com</a>
MATTHEW MCVEE	<a href="mailto:matthew.mcvee@pacificorp.com">matthew.mcvee@pacificorp.com</a>
ETTA LOCKEY (C)	<a href="mailto:etta.lockey@pacificorp.com">etta.lockey@pacificorp.com</a>

<b>PGE LC 67</b>	
FRANCO ALBI V. DENISE SAUNDERS PATRICK G HAGER	<a href="mailto:franco.albi@pgn.com">franco.albi@pgn.com</a> <a href="mailto:denise.saunders@pgn.com">denise.saunders@pgn.com</a> <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a> <a href="mailto:patrick.hager@pgn.com">patrick.hager@pgn.com</a>
<b>RENEWABLE NW LC 67</b>	
RENEWABLE NORTHWEST MICHAEL O'BRIEN (C) SILVIA TANNER	<a href="mailto:dockets@renewablenw.org">dockets@renewablenw.org</a> <a href="mailto:michael@renewablenw.org">michael@renewablenw.org</a> <a href="mailto:silvia@renewablenw.org">silvia@renewablenw.org</a>
<b>ROBERT J. PROCTER</b>	
BOB PROCTER	<a href="mailto:proctereconomics@gmail.com">proctereconomics@gmail.com</a>
<b>SIERRA CLUB</b>	
GLORIA D SMITH (C) ANA BOYD (C) CESIA KEARNS	<a href="mailto:gloria.smith@sierraclub.org">gloria.smith@sierraclub.org</a> <a href="mailto:ana.boyd@sierraclub.org">ana.boyd@sierraclub.org</a> <a href="mailto:cesia.kearns@sierraclub.org">cesia.kearns@sierraclub.org</a>
<b>STAFF LC 67</b>	
CAROLINE MOORE SOMMER MOSER (C)	<a href="mailto:caroline.f.moore@state.or.us">caroline.f.moore@state.or.us</a> <a href="mailto:sommer.moser@doj.state.or.us">sommer.moser@doj.state.or.us</a>

Dated June 12, 2018.

  
 Jennifer Angell  
 Supervisor, Regulatory Operations