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August 26, 2022

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
P.O. Box 1088  
201 High Street SE, Suite 100  
Salem, Oregon 97308-1088

**Re: Docket PCN 5 – In the Matter of Idaho Power Company’s Petition for Certificate of Public Convenience and Necessity.**

Attention Filing Center:

Attached for filing in the above-referenced docket is Idaho Power Company’s Motion for Protective Order.

Please contact this office with any questions.

Sincerely,

Suzanne Prinsen  
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**PCN 5**

In the Matter of  
IDAHO POWER COMPANY  
  
PETITION FOR CERTIFICATE OF  
PUBLIC CONVENIENCE AND  
NECESSITY.

MOTION FOR PROTECTIVE ORDER  
  
*Expedited Consideration Requested*

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Idaho Power Company (“Idaho  
2 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s  
3 (“Commission”) general protective order in this proceeding. Good cause exists to issue a  
4 Protective Order to protect commercially sensitive and confidential business information  
5 related to the Company’s Petition for Certificate of Public Convenience and Necessity  
6 (“Petition”). Idaho Power requests expedited consideration of this motion in order to provide  
7 confidential information in its initial filings.

8 In support of this Motion, the Company states:

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

17 2. Idaho Power will soon file its Petition and Responses to Standard Data Requests,  
18 which will include confidential material concerning mitigation action costs, contracts, and

1 contract pricing pursuant to OAR 860-025-0030. Public disclosure of the confidential  
2 information would be detrimental to Idaho Power and its customers.

3 3. In addition to the Standard Data Requests containing confidential material, it is  
4 substantially likely that Staff and others in this proceeding will seek to discover confidential  
5 business information. "The Commission's standard blanket protective order is designed to  
6 facilitate discovery in cases involving discovery of large numbers of documents." See *In re*  
7 *Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991). Issuance  
8 of a protective order will facilitate the production of relevant information and expedite the  
9 discovery process.

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

DATED: August 26, 2022

McDOWELL RACKNER GIBSON PC



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