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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 202

In the Matter of Idaho Power Company's  
Application to Accelerate Depreciation of  
Existing Metering Equipment to be  
Replaced by Advanced Metering  
Infrastructure ("AMI") Installation; and to  
Implement Revised Depreciation Rates for  
the Company's Electric Plant-In-Service

**MOTION FOR STANDARD  
PROTECTIVE ORDER**

Pursuant to OAR 860-012-0035(1)(k), Idaho Power Company moves for entry of the Commission's standard protective order in this proceeding. As good cause for this motion, Idaho Power Company states:

1. The Commission's rules authorize Idaho Power Company to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See OAR 860-11-0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); 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* (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").

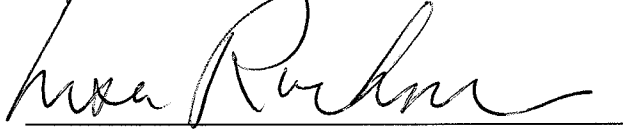
2. Idaho Power Company anticipates that discovery in this proceeding may include proprietary business and financial information. Idaho Power Company will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

3. Issuance of a protective order will facilitate the production of relevant information, aid the discovery process and expedite resolution of this case.

1 For the foregoing reasons, Idaho Power Company requests entry of the  
2 Commission's standard protective order in this docket.

3 DATED: October 15, 2007.

MCDOWELL & RACKNER PC

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6 Lisa F. Rackner

7 Of Attorneys for Idaho Power Company  
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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UE 202

In the Matter of Idaho Power Company's  
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Implement Revised Depreciation Rates for  
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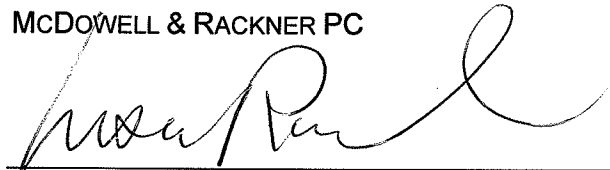
**IDAHO POWER COMPANY'S REQUEST  
FOR CHANGE TO SERVICE LIST**

Idaho Power Company requests that the Oregon Public Utility Commission ("OPUC")  
change the parties on the official service list in this proceeding as follows:

Add: Mike Youngblood  
Idaho Power  
PO BOX 70  
BOISE ID OR 83707  
[myoungblood@idahopower.com](mailto:myoungblood@idahopower.com)

DATED: October 15, 2008.

MCDOWELL & RACKNER PC



Lisa F. Rackner

Of Attorneys for Idaho Power Company

# McDowell & Rackner PC



WENDY MCINDOO  
Direct (503) 595-3922  
wendy@mcd-law.com

October 15, 2008

## VIA ELECTRONIC FILING

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

**Re: Docket UE 202**

Enclosed for filing in the above-identified docket is Idaho Power Company's Motion for Standard Protective Order and a Request for Change to Service List. A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

Wendy McIndoo

Enclosures

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**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing document in UE 202 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

John R. Gale  
Vice President - Regulatory Affairs  
Idaho Power Company  
E-mail: [rgale@idahopower.com](mailto:rgale@idahopower.com)

Barton L. Kline  
Lead Counsel  
Idaho Power Company  
E-mail: [bkline@idahopower.com](mailto:bkline@idahopower.com)


Donovan Walker  
Corporate Counsel  
Idaho Power Company  
E-mail: [dwalker@idahopower.com](mailto:dwalker@idahopower.com)

Courtney Waites  
Pricing Analyst  
Idaho Power Company  
E-mail: [cwaites@idahopower.com](mailto:cwaites@idahopower.com)

Michael J. Youngblood  
Senior Pricing Analyst  
Pricing & Regulatory Services  
Idaho Power Company  
[myoungblood@idahopower.com](mailto:myoungblood@idahopower.com)

Christa Bearry  
Idaho Power Company  
E-mail: [cbearry@idahopower.com](mailto:cbearry@idahopower.com)

DATED: October 15, 2008

  
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Wendy L. McIndoo