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April 3, 2009

VIA ELECTRONIC FILING AND U.S. MAIL

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

Re: Docket UE 210

Enclosed for filing in the above docket is an original and one copy of PacifiCorp's Motion for Protective Order. A copy of this filing has been served on all parties to PacifiCorp's last general rate case proceeding, UE 179, as indicated on the attached Certificate of Service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Amie Jamieson".

Amie Jamieson

cc: UE 179 Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document on the parties of record in PacifiCorp's last general rate case, Docket UE 179, 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.

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DATED: April 3, 2009.

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Amie Jamieson

Of Attorneys for PacifiCorp

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

3 **UE 210**

4 In the Matter of PacifiCorp d/b/a Pacific
5 Power's Request for a General Rate
6 Increase in the Company's Oregon
7 Annual Revenues

MOTION FOR PROTECTIVE ORDER
Expedited Consideration Requested

8 Pursuant to ORCP 36(C)(7) and OAR 860-012-0035(1)(k), PacifiCorp d/b/a Pacific
9 Power ("Company") moves for the expedited entry of the Public Utility Commission of
10 Oregon's ("Commission") general protective order in this proceeding. The Company requests
11 expedited consideration of this Motion in order to allow parties that execute the protective
12 order to obtain prompt access to the confidential testimony filed in support of the Petition and
13 to expedite any discovery in this proceeding. Good cause exists to issue a Protective Order to
14 protect commercially sensitive and confidential business information related to the Company's
15 request for a general rate increase. In support of this Motion, the Company states:

16 1. The Commission's rules authorize PacifiCorp to seek reasonable restrictions on
17 discovery of trade secrets and other confidential business information. See OAR 860-11-
18 000(3) (adopting Oregon Rules of Civil Procedure ("ORCP"); ORCP 36(C)(7) (providing
19 protection against unrestricted discovery of "trade secrets or other confidential research,
20 development, or commercial information"). See also *In re Investigation into the Cost of*
21 *Providing Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing
22 that protective orders are a reasonable means to protect "the rights of a party to trade secrets
23 and other confidential commercial information" and "to facilitate the communication of
24 information between litigants").

25 2. The Company anticipates that parties to this docket may request proprietary cost
26 data and models, commercially sensitive load and resource projections, confidential market

1 analyses and business projections, confidential employee data, and confidential information
2 regarding contracts for the purchase or sale of electric power, power services, or fuel. This
3 confidential business information is of significant commercial value, which could expose the
4 Company to competitive injury if disclosure is unrestricted.

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

12 4. The Company requests expedited consideration of this Motion to allow parties
13 who execute the protective order to obtain prompt access to the confidential workpapers in
14 support of the Company's request for a general rate increase and to expedite any discovery in
15 this proceeding.

16 For the foregoing reasons, PacifiCorp requests expedited entry of a standard
17 Protective Order in this docket.

18 DATED: April 3, 2009.

McDOWELL & RACKNER PC

19 

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21 Amie Jamieson
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