

McDowell Rackner & Gibson PC



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March 29, 2013

VIA ELECTRONIC AND U.S. MAIL

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

Re: UE 265 –Idaho Power Company’s 2012 Annual Power Supply Expense True-Up

Attention Filing Center:

Enclosed in the above-captioned docket are an original and one copy of Idaho Power Company’s Motion for Protective Order.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service. Please contact me with any questions.

Very truly yours,

A handwritten signature in black ink that reads "Wendy McIndoo". The signature is fluid and cursive.

Wendy McIndoo
Office Manager

Enclosures

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 265

In the Matter of
IDAHO POWER COMPANY
2012 Annual Power Supply Expense
True-up

MOTION FOR PROTECTIVE ORDER

Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho Power") moves for the entry of the Public Utility Commission of Oregon's ("Commission") general protective order in this proceeding. Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information related to the Company's filed 2012 Annual Power Supply Expense True-Up.

In support of this Motion, the Company states:

1. The Commission's rules authorize Idaho Power to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See 860-001-0080; 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").

2. On February 25, 2013, Idaho Power filed its 2012 Annual Power Supply Expense True-Up. It is expected that certain documents related to the filing will contain confidential material, including but not limited to proprietary cost data and models, commercially sensitive load and resource projections, confidential market analyses and business projections, and

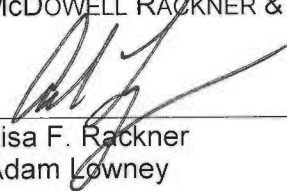
1 confidential information regarding contracts for the purchase or sale of electric power, power
2 services, or fuel. Public disclosure of the confidential information could be detrimental to
3 Idaho Power and its customers.

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

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

12 DATED: March 29, 2013.

McDOWELL RACKNER & GIBSON PC

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14 
15 Lisa F. Rackner
Adam Lowney

16 **IDAHO POWER COMPANY**

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18 Idaho Power Company
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UE 265 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

OPUC Dockets
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DATED: March 29, 2013



Wendy McIndoo
Office Manager