

May 9, 2018

VIA ELECTRONIC FILING

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

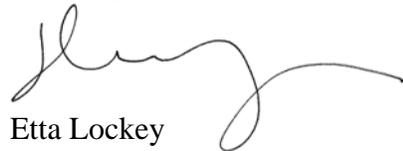
Attn: Filing Center

**RE: UE ___—PacifiCorp's 2018 Power Cost Adjustment Mechanism—Motion for
General Protective Order**

PacifiCorp d/b/a Pacific Power intends to file its 2018 Power Cost Adjustment Mechanism on or about May 15, 2019. To facilitate review of materials in this proceeding, PacifiCorp encloses for filing its Motion for General Protective Order.

If you have questions about this filing, please contact Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,



Etta Lockey
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE ____

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

2018 Power Cost Adjustment Mechanism.

MOTION FOR PROTECTIVE ORDER

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power moves the Public Utility Commission of Oregon (Commission) for entry of a standard protective order in this proceeding. PacifiCorp will file its 2018 Power Cost Adjustment Mechanism (PCAM) on or before May 15, 2019. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to this filing.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission’s standard protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.² PacifiCorp expects to receive discovery requests related to the 2018 PCAM, including requests for propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(1) (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”).

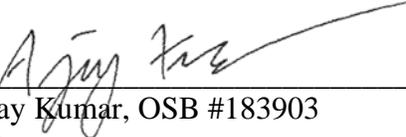
² OAR 860-001-0080(2).

projections, or confidential information regarding contracts for the purchase or sale of electric power, power services, or fuel. 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 the parties to these proceedings will seek to discover further information held by PacifiCorp, including confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process. PacifiCorp has reached out to the Staff of the Public Utility Commission, and they do not oppose this motion.

For these reasons, PacifiCorp respectfully requests that the Commission enter its standard protective order in this docket.

Respectfully submitted this 9th day of May, 2019,



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