



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

February 10, 2020

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: UE 374—PacifiCorp's Motion for a General Protective Order
Expedited Consideration Requested

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for General Protective Order with Expedited Consideration Requested. The entry of a general protective order will prevent delay in providing confidential information when PacifiCorp files its general rate case, which has been pre-assigned docket number UE 374, on February 14, 2020.

Please direct any inquiries about this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-6583.

Sincerely,

Etta Lockey
Vice President, Regulation

Enclosure

cc: Service List—UE 263

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 374**

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
Request for a General Rate Revision.

**PACIFICORP’S MOTION FOR A
GENERAL PROTECTIVE ORDER**
***EXPEDITED CONSIDERATION
REQUESTED***

1 Under ORCP 36(C)(1) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power
2 (Company) moves the Public Utility Commission of Oregon (Commission) for entry of a general
3 protective order in these proceedings. The Company will file a request for a general rate increase
4 on February 14, 2020. The initial filing, including the Company’s responses to many of
5 Commission Staff’s Standard Data Requests, will include confidential information. The
6 Company requests expedited consideration of this motion so it may promptly provide the
7 confidential information in the initial filing to parties. Good cause exists to issue a protective
8 order to protect commercially sensitive and confidential business information related to the
9 Company’s request for a general rate increase.

10 The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on
11 discovery of trade secrets and other confidential business information.¹ The Commission’s
12 general protective order is designed to allow the broadest possible discovery consistent with
13 the need to protect confidential information.² PacifiCorp’s initial filing in this case includes
14 proprietary cost data and models, commercially sensitive pricing information, confidential

¹ See OAR 860-001-0080(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).

1 market analyses and business projections, and confidential information regarding contracts
2 for the purchase or sale of electric power, power services, or fuel. PacifiCorp will be
3 exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential
4 business information.

5 It is also substantially likely that the parties to these proceedings will seek to discover
6 further information held by PacifiCorp, including confidential business information.
7 Issuance of a protective order will facilitate the production of relevant information and
8 expedite the discovery process.

9 For these reasons, PacifiCorp respectfully requests that the Commission enter its
10 general protective order in this docket. The Company requests expedited consideration of
11 this motion to allow parties who execute the protective order to promptly obtain the
12 confidential information in the initial filing and responses to discovery requests.

Respectfully submitted this 10th day of February, 2020.



Matthew D. McVee
Chief Regulatory Counsel
PacifiCorp

CERTIFICATE OF SERVICE

I certify that I electronically filed a true and correct copy of PacifiCorp's **Motion for a General Protective Order** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 263

OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 dockets@oregoncub.org	GREGORY M. ADAMS RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com
GREG BASS NOBLE AMERICAS ENERGY SOLUTIONS, LLC 401 WEST A ST., STE. 500 SAN DIEGO, CA 92101 gbass@noblesolutions.com	KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 kboehm@bkllawfirm.com
STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE, AR 72716-0550 stephen.chriss@wal-mart.com	MARIANNE GARDNER (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308-1088 marianne.gardner@state.or.us
KEVIN HIGGINS ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY, UT 84111-2322 khiggins@energystrat.com	ROBERT JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 bob@oregoncub.org
SARAH E LINK (C) PACIFIC POWER 825 NE MULTNOMAH ST STE 1800 PORTLAND, OR 97232 sarah.link@pacificorp.com	JODY KYLER COHN BOEHM, KURTZ & LOWRY 36 E SEVENTH ST STE 1510 CINCINNATI, OH 45202 jkylar@bkllawfirm.com
KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mrg-law.com	SAMUEL L ROBERTS (C) HUTCHINSON COX COONS ORR & SHERLOCK 777 HIGH ST STE 200 PO BOX 10886 EUGENE, OR 97440 sroberts@eugenelaw.com

<p>TRACY RUTTEN LEAGUE OF OREGON CITIES 1201 COURT STREET NE SUITE 200 SALEM, OR 97301 trutten@orcities.org</p>	<p>IRION A SANGER (C) SANGER LAW PC 1041 SE 58TH PLACE PORTLAND OR 97215 irion@sanger-law.com</p>
<p>DONALD W SCHOENBECK (C) REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER, WA 98660-3455 dws@r-c-s-inc.com</p>	<p>NONA SOLTERO FRED MEYER STORES/KROGER 3800 SE 22ND AVE PORTLAND, OR 97202 nona.soltero@fredmeyer.com</p>
<p>DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC1301 PORTLAND, OR 97204 doug.tingey@pgn.com</p>	<p>JAY TINKER PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC-0306 PORTLAND, OR 97204 pge.opuc.filings@pgn.com</p>
<p>MICHAEL T WEIRICH (C) PUC STAFF--DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us</p>	<p>PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com</p>

Dated February 10, 2020.



Mary Penfield
Adviser, Regulatory Operations