

McDowell & Rackner PC



KATHERINE A. McDOWELL
Direct (503) 595-3924
katherine@mcd-law.com

September 12, 2007

VIA ELECTRONIC FILING

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

Re: Docket UM 1330

Enclosed for filing in the above-referenced docket are an original and one copy of PacifiCorp's Motion for Standard Protective Order. 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,

A handwritten signature in black ink, appearing to be 'Katherine A. McDowell', written over a horizontal line.

Katherine A. McDowell

Enclosures

1
2
3
4
5
6
7
8

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1330

In the Matter of
PUBLIC UTILITY COMMISSION OF
OREGON
Investigation of Automatic Adjustment
Clause Pursuant to SB 838

**MOTION FOR STANDARD
PROTECTIVE ORDER**
(Expedited Review Requested)

9 Pursuant to OAR 860-012-0035(1)(k), PacifiCorp moves for entry of the
10 Commission's standard protective order in this proceeding. Because discovery is now
11 pending in this case that implicates confidential information, PacifiCorp seeks expedited
12 review of this motion. As good cause for this motion, PacifiCorp states:

13 1. The Commission's rules authorize PacifiCorp to seek reasonable restrictions
14 on discovery of trade secrets and other confidential business information. See OAR 860-11-
15 0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP")); ORCP 36(C)(7) (providing
16 protection against unrestricted discovery of "trade secrets or other confidential research,
17 development, or commercial information"). See also *In re Investigation into the Cost of*
18 *Providing Telecommunication Service* (UM 351), Order No. 91-500 (1991) (recognizing that
19 protective orders are a reasonable means to protect "the rights of a party to trade secrets
20 and other confidential commercial information" and "to facilitate the communication of
21 information between litigants").

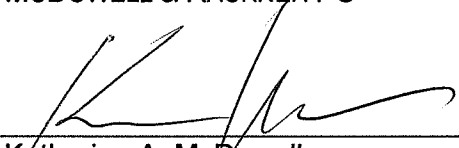
22 2. PacifiCorp anticipates that discovery in this proceeding may include
23 proprietary cost data and models, commercially sensitive load and resource projections and
24 confidential information regarding contracts for the purchase or sale of electric power, power
25 services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make
26 unrestricted disclosure of its confidential business information.

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

3 For the foregoing reasons, PacifiCorp requests entry of the Commission's standard
4 protective order in this docket.

5 DATED: September 12, 2007.

McDOWELL & RACKNER PC

6
7
8 
Katherine A. McDowell

Attorneys for PacifiCorp

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1330 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.

Lowrey R. Brown
Citizens' Utility Board of Oregon
lowrey@oregoncub.org

Bob Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

John W. Stephens
Esler Stephens & Buckley
stephens@eslerstephens.com

Jason Eisdorfer
Citizens' Utility Board
jason@oregoncub.org

Judy Johnson
Public Utility Commission of Oregon
PO Box 2148
Salem OR 97308-2148
judy.johnson@state.or.us

Allen Chan
Davison Van Cleve, PC
333 SW Taylor, Suite 400
Portland, OR 97204
mail@dvclaw.com

Michael Weirich
Department of Justice
Regulated Utility & Business Section
1162 Court Street NE
Salem, OR 97301-4096
michael.weirich@doj.state.or.us

Melinda J. Davison
Davison Van Cleve, PC
333 SW Taylor, Suite 400
Portland, OR 97204
mail@dvclaw.com

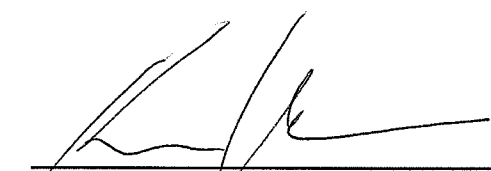
Patrick G. Hager
Portland General Electric
121 SW Salmon Street 1WTC0702
Portland, OR 97204
patrick.hager@pgn.com

Cece L. Coleman
Portland General Electric
121 SW Salmon Street
Portland, OR 97204
cece.coleman@pgn.com

Troy Gagliano
Renewable Northwest Project
troy@rnp.org

Ann English Gravatt
Renewable Northwest Project
ann@rnp.org

DATED: September 12, 2007



Katherine A. McDowell
Attorney for PacifiCorp