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September 3, 2009

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 2148
Salem, OR 97308-2148

Re: IN THE MATTER OF PUBLIC UTILITY COMMISSION OF OREGON
INVESTIGATION TO DETERMINE IF PACIFIC POWER'S RATE REVISION HAS BEEN
CONSISTENT WITH THE METHODOLOGIES AND CALCULATIONS REQUIRED BY
ORDER NO. 05-584 (UM 1442)

Attention Filing Center:

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

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to
me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,



Jeff Lovinger

cc: UM1442 Service List

Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1442

IN THE MATTER OF PUBLIC UTILITY
COMMISSION OF OREGON
INVESTIGATION TO DETERMINE IF
PACIFIC POWER'S RATE REVISION HAS
BEEN CONSISTENT WITH THE
METHODOLOGIES AND
CALCULATIONS REQUIRED BY
ORDER NO. 05-584.

MOTION FOR PROTECTIVE ORDER

Pursuant to ORCP 36(C)(7) and OAR 860-012-0035(1)(k), PacifiCorp d/b/a Pacific Power (“Company”) moves for the entry of a Protective Order in this proceeding.

In support of this Motion, the Company states:

1. The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of sensitive commercial information and other confidential business information. See OAR 860-011-000(3) (adopting Oregon Rules of Civil Procedure (“ORCP”)); 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”).

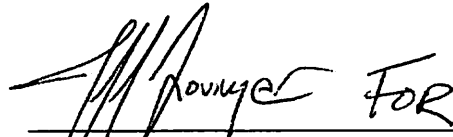
2. The Company anticipates that parties to this docket may request detailed information regarding PacifiCorp’s application for rate revisions establishing avoided cost purchases from Qualifying Facilities of 10,000 kW or less (Advice No. 09-012). The Company further anticipates that discovery in this proceeding may include, among other things, requests for production of proprietary agreements, documents, and analysis relating to Advice No. 09-012. Discovery in this proceeding could also produce commercially-sensitive load and resource projections, information

1 covered by confidentiality agreements, and other confidential analyses. This confidential business
2 information is of significant commercial value, which could expose the Company and counter-
3 parties to competitive injury if disclosure is unrestricted.

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

10 For the foregoing reasons, PacifiCorp requests entry of a Standard Protective Order in this
11 docket.

12 DATED: September 3, 2009.


13  FOR
14 _____
15 Jordan A. White
16 Senior Counsel
17 Pacific Power

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Attorney for PacifiCorp

CERTIFICATE OF SERVICE

I hereby certify that, on September 3, 2009, I served a true and correct copy of the foregoing *Motion for Protective Order* on the following named persons/entities by depositing a true copy thereof in the United States Mail at Portland, Oregon

<p>Michael T. Weirich Assistant Attorney General Regulated Utility & Business Section Department of Justice 1162 Court St. NE Salem, OR 97301-4096</p>	<p>Ed Durrenberger Oregon Public Utilities Commission PO Box 2148 Salem, OR 97308-2148</p>
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Jeffrey Lovinger
Attorney for PacificCorp