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November 26, 2012

***VIA ELECTRONIC MAIL AND  
OVERNIGHT DELIVERY***

Public Utility Commission of Oregon  
550 Capitol St NE #215  
P.O. Box 2148  
Salem, OR 97308-2148

Attn: Filing Center

RE: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff  
Investigation Into Qualifying Facility Contracting and Pricing, Docket No. UM 1610

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

A copy of this filing has been served on all parties to this proceeding as indicated by the  
attached certificate of service.

Very truly yours,

Mary Wiencke  
Legal Counsel  
Pacific Power

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1610**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Staff Investigation Into Qualifying Facility  
Contracting and Pricing

MOTION FOR PROTECTIVE ORDER

1 Pursuant to OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (Company),  
2 moves for entry of the Public Utility Commission of Oregon's (Commission) general  
3 protective order in this docket. As good cause for this motion, the Company states:

4 1. The Commission's rules authorize the Company to seek reasonable  
5 restrictions on discovery of trade secrets and other confidential business information. *See*  
6 OAR 860-001-0080(3) (allowing confidential designation of information that is protected  
7 under Oregon Rule of Civil Procedure 36(C)(7) or is exempt from public disclosure under the  
8 Public Records Law). *See also Re Investigation into the Cost of Providing*  
9 *Telecommunications Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing that  
10 protective orders are a reasonable means to protect "the rights of a party to trade secrets and  
11 other confidential commercial information" and "to facilitate the communication of  
12 information between litigants").

13 2. The Company anticipates that parties to this docket may request proprietary  
14 cost data, commercially sensitive load and resource projections, confidential market analyses  
15 and business projections, and confidential information relating to renewable energy credits  
16 and/or compliance with ORS 469A. This confidential business information is of significant  
17 commercial value, which could expose the Company to competitive injury if disclosure is  
18 unrestricted.

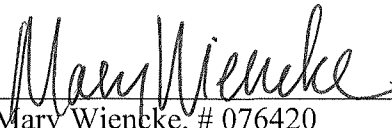
1           3.       It is substantially likely that Commission Staff and others in this proceeding  
2 will seek to discover a large amount of information held by PacifiCorp, including  
3 confidential business information. “The Commission’s standard blanket protective order is  
4 designed to facilitate discovery in cases involving discovery of large numbers of documents.”  
5 *See In re Portland Extended Area Service Region*, Docket UM 261, Order 91-958 (1991).  
6 Issuance of a protective order will facilitate production of relevant information and expedite  
7 the discovery process.

8           For the foregoing reasons, PacifiCorp requests entry of the Commission’s standard  
9 Protective Order in this docket on an ongoing basis.

10 DATED: November 26, 2012

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Respectfully submitted,

  
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Mary Wiencke, # 076420  
Legal Counsel  
Pacific Power

**CERTIFICATE OF SERVICE**

I certify that I have cause to be served the foregoing **MOTION FOR PROTECTIVE ORDER OF PACIFICORP** in OPUC Docket No. UM 1610 by first class mail or electronic mail to the parties on the attached service list.

DATED this 26<sup>th</sup> day of November, 2012.

  
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