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April 13, 2016

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, OR 97308-1088

**Re: UM 1716 - In the Matter of PUBLIC UTILITY COMMISSION OF OREGON,
Investigation to Determine the Resource Value of Solar**

Attached for filing in the above-referenced docket is Idaho Power Company's Motion for Protective Order.

Please contact this office with any questions.

Very truly yours,

Wendy McIndoo
Office Manager

Attachments

1 including but not limited to proprietary cost data and models, commercially sensitive load and
2 resource projections, confidential market analyses and business projections, and confidential
3 information regarding contracts for the purchase or sale of electric power, power services, or
4 fuel. Public disclosure of the confidential information could be detrimental to Idaho Power and
5 its customers.

6 3. It is substantially likely that Staff and others in this proceeding will seek to
7 discover confidential business information. "The Commission's standard blanket protective
8 order is designed to facilitate discovery in cases involving discovery of large numbers of
9 documents." See *In re Portland Extended Area Service Region*, Docket UM 261, Order No.
10 91-958 (1991). Issuance of a protective order will facilitate the production of relevant
11 information and expedite the discovery process.

12 For the foregoing reasons, Idaho Power requests entry of a standard Protective Order
13 in this docket.

14 DATED: April 13, 2016.

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