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
BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1716

In the Matter of
PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation to Determine the Resource
Value of Solar.

MOTION FOR PROTECTIVE ORDER
EXPEDITED CONSIDERATION
REQUESTED

Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho
Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's
("Commission") general protective order in this proceeding. Good cause exists to issue a
Protective Order to protect the Company's commercially sensitive and confidential business
information produced in this docket. Because of the expedited timeline for responding to
Staff's Data Requests, Idaho Power requests that the general protective order be entered on
an expedited basis.

In support of this Motion, the Company states:

1. The Commission's rules authorize Idaho Power to seek reasonable restrictions
on discovery of trade secrets and other confidential business information. See 860-001-0080;
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. On February 18, 2015, Idaho Power filed its Petition to Intervene in this docket.
It is expected that certain documents related to the filing will contain confidential material,
including but not limited to proprietary cost data and models, commercially sensitive load and resource projections, confidential market analyses and business projections, and confidential information regarding contracts for the purchase or sale of electric power, power services, or fuel. Public disclosure of the confidential information could be detrimental to Idaho Power and its customers.

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

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

DATED: April 13, 2016.

[Signature]

Lisa Rackner

IDAHO POWER COMPANY

Donovan Walker
Idaho Power Company
P.O. Box 70
1221 W. Idaho Street
Boise, Idaho 83707-0070
Telephone: (208) 388-5317
Facsimile: 208-388-6936
E-mail: dwalker@idahopower.com

Attorneys for Idaho Power Company