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Portland, Oregon 97232

August 24, 2015

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

RE: UM 1734 —PacifiCorp's Motion for Standard Protective Order

PacifiCorp d/b/a Pacific Power encloses for filing in the above-referenced docket its Motion for Standard Protective Order.

If you have questions about this filing, please contact Erin Apperson, Manager of Regulatory Affairs, at (503) 813-6642.

Sincerely,

R. Bryce Dalley
Vice President, Regulation

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1734**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Application to Reduce the Qualifying Facility
Contract Term and Lower the Qualifying
Facility Standard Contract Eligibility Cap

PACIFICORP’S MOTION FOR
STANDARD PROTECTIVE ORDER

1

2 Under ORCP 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power
3 (PacifiCorp or Company) moves the Public Utility Commission of Oregon (Commission) for
4 entry of a standard protective order in this proceeding.

5 The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on
6 discovery of trade secrets and other confidential business information.¹ The Commission’s
7 standard protective order is designed to allow the broadest possible discovery consistent with
8 the need to protect confidential information.² PacifiCorp requests this protective order to
9 facilitate the communication of information between the parties and expedite the discovery
10 process.

11 It is expected that certain documents related to PacifiCorp’s filing will contain
12 confidential information, including but not limited to proprietary cost data and models,
13 commercially sensitive load and resource projections, confidential market analyses and
14 business projections, and confidential information regarding contracts for the purchase or

¹ See OAR 860-001-0000(1) (adopting the 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 trade secrets and other confidential commercial information and “to facilitate the communication of information between litigants”).


² OAR 860-001-0080(2).

1 sale of electric power, power services, or fuel. Furthermore, it is substantially likely that the
2 staff and other parties to this proceeding will seek to discover confidential business
3 information. Public disclosure of the confidential information could be detrimental to
4 PacifiCorp and its customers. Accordingly, good cause exists to issue a protective order to
5 protect commercially sensitive and confidential business information.

6 For these reasons, PacifiCorp respectfully requests that the Commission enter its
7 standard protective order in this docket.

Respectfully submitted this 24th day of August 2015.

By:


Dustin Till
Senior Counsel
PacifiCorp d/b/a Pacific Power