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December 15, 2017

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 1911
Idaho Power Company's Certificate of Service

Dear Filing Center:

Enclosed in reference to the above docket is Idaho Power's Motion for Protective Order.

Please contact this office with any questions.

Very truly yours,

Wendy McIndoo
Office Manager

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1911**

4 IN THE MATTER OF IDAHO POWER
5 COMPANY'S COMPLIANCE FILING
6 REGARDING THE RESOURCE VALUE
7 OF SOLAR PURSUANT TO ORDER NO.
8 17-357.

MOTION FOR PROTECTIVE ORDER

9 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Idaho Power Company ("Idaho
10 Power" or "Company") moves for the entry of the Public Utility Commission of Oregon's
11 ("Commission") general protective order in this proceeding. Good cause exists to issue a
12 Protective Order to protect commercially sensitive and confidential business information
13 related to the Company's Compliance Filing Regarding the Resource Value of Solar Pursuant
14 to Order No. 17-357.

15 In support of this Motion, the Company states:

16 1. The Commission's rules authorize Idaho Power to seek reasonable restrictions
17 on discovery of trade secrets and other confidential business information. See 860-001-0080;
18 ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other
19 confidential research, development, or commercial information"); see also *In re Investigation*
20 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
21 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a
22 party to trade secrets and other confidential commercial information" and "to facilitate the
23 communication of information between litigants").

24 2. On November 29, 2017, Idaho Power filed its Compliance Filing Regarding the
25 Resource Value of Solar Pursuant to Order No. 17-357. It is expected that certain documents
26 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

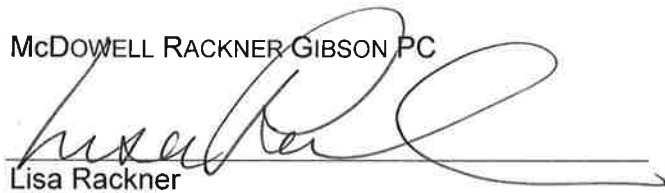
1 analyses and business projections, and confidential information regarding contracts for the
2 purchase or sale of electric power, power services, or fuel. Public disclosure of the confidential
3 information could be detrimental to Idaho Power and its customers.

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

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

12 DATED: December 15, 2017

13 McDOWELL RACKNER GIBSON PC

14 
15 Lisa Rackner

16 **IDAHO POWER COMPANY**

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