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January 6, 2022

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-108

Re: UM 2011 – *In the Matter of Public Utility Commission of Oregon, General Capacity Investigation*

Attention Filing Center:

Attached for filing in the above-captioned docket is the Joint Utilities' Motion for Protective Order.

Please contact this office with any questions.

Thank you,

Suzanne Prinsen
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2011

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

General Capacity Investigation.

JOINT UTILITES' MOTION FOR
PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Portland General Electric Company,
2 PacifiCorp d/b/a Pacific Power, and Idaho Power Company (together, the Joint Utilities) move for
3 the entry of the Public Utility Commission of Oregon's ("Commission") general protective order
4 in this proceeding. Good cause exists to issue a Protective Order to protect commercially sensitive
5 and confidential business information related to the Commission's general capacity investigation.

6 In support of this Motion, the Joint Utilities state:

7 1. The Commission's rules authorize a party to seek reasonable restrictions on
8 discovery of trade secrets and other confidential business information. *See* 860-001-0080;
9 ORCP 36(C)(1) (providing protection against unrestricted discovery of "trade secrets or other
10 confidential research, development, or commercial information"); *see also In re Investigation*
11 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500
12 (1991) (recognizing that protective orders are a reasonable means to protect "the rights of a
13 party to trade secrets and other confidential commercial information" and "to facilitate the
14 communication of information between litigants").

15 2. The Joint Utilities have agreed to conduct specific analyses and provide capacity
16 contribution results and associated data. Some of the information provided will contain
17 confidential material, including but not limited to proprietary cost data and models,

1 commercially sensitive load and resource projections, confidential market analyses and
2 business projections, and confidential information regarding contracts for the purchase or sale
3 of electric power, power services, or fuel. Public disclosure of the confidential information
4 would be detrimental to the Joint Utilities and their customers.

5 For the foregoing reasons, the Joint Utilities request entry of a standard Protective
6 Order in this docket.

DATED: January 6, 2022

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