

May 28, 2019

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

**RE: UM 2014—PacifiCorp's 2018 Renewable Portfolio Standards Compliance Report—
Motion for General Protective Order**

PacifiCorp d/b/a Pacific Power intends to file its 2018 Renewable Portfolio Standards Compliance Report on or about June 1, 2019. To facilitate review of materials in this proceeding, PacifiCorp encloses for filing its Motion for General Protective Order.

If you have questions about this filing, please contact Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,



Etta Lockey
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2014

In the Matter of
PACIFICORP d/b/a PACIFIC POWER
2018 Renewable Portfolio Standard
Compliance Report.

**PACIFICORP’S MOTION FOR
PROTECTIVE ORDER**

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power (PacifiCorp) moves the Public Utility Commission of Oregon (Commission) for entry of a standard protective order in this proceeding. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to PacifiCorp’s renewable portfolio standard (RPS) compliance position and strategies.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.¹ The Commission’s standard protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.² PacifiCorp expects to receive discovery requests related to this report, including requests for propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business projections, or confidential information regarding contracts for the purchase or sale of

¹ See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); ORCP 36(C)(1) (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 OAR 860-001-0080(2).

electric power, power services, or fuel. PacifiCorp will be exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential business information.

It is also substantially likely that the parties to these proceedings will seek to discover further information held by PacifiCorp, including confidential business information. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

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

Respectfully submitted this 28th day of May, 2019.



Jessica Ralston, OSB #185704

Senior Attorney

PacifiCorp

825 NE Multnomah Street, Suite 1800

Portland, OR 97232

(503) 813-5817

jessica.ralston@pacificorp.com