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September 16, 2022

**VIA ELECTRONIC FILING**

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

**Re: UM 2255 - In the Matter of Idaho Power Company, Application for Approval of  
2026 All-Source Request for Proposals to Meet 2026 Capacity Resource Need.**

Attention Filing Center:

Attached for filing in the above-captioned docket is Idaho Power Company's Motion for Protective Order.

Please contact this office with any questions.

Sincerely,

Suzanne Prinsen  
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2255**

In the Matter of

IDAHO POWER COMPANY

Application for Approval of 2026 All-Source  
Request for Proposals to Meet 2026  
Capacity Resource Need.

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Idaho Power Company (“Idaho  
2 Power” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s  
3 (“Commission”) general protective order in this proceeding. Good cause exists to issue a  
4 Protective Order to protect commercially sensitive and confidential business information  
5 produced in this docket.

6 In support of this Motion, Idaho Power states:

7 1. The Commission’s rules authorize Idaho Power to seek reasonable restrictions  
8 on 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. On September 15, 2022, Idaho Power filed an application asking the Commission  
16 to open a docket for approval of a solicitation process for new resources and to appoint an  
17 independent evaluator to oversee the request for proposal (RFP) process. Good cause exists  
18 to issue a general protective order to protect commercially sensitive and confidential business  
19 information related to the RFP.

1           3. It is substantially likely that Staff and others in this proceeding will seek  
2 information through discovery that may include RFP-related information covered by  
3 confidentiality agreements, proprietary cost data and models, commercially sensitive load and  
4 resource projections, and confidential market and pricing analyses. Idaho Power will be  
5 exposed to competitive injury if it is forced to make unrestricted disclosure of its confidential  
6 business information. “The Commission’s standard blanket protective order is designed to  
7 facilitate discovery in cases involving discovery of large numbers of documents.” See *In re*  
8 *Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991). Issuance  
9 of a protective order will facilitate the production of relevant information and expedite the  
10 discovery process.

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

DATED: September 16, 2022

**McDOWELL RACKNER GIBSON PC**



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**IDAHO POWER COMPANY**

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