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December 26, 2018

***VIA ELECTRONIC FILING***

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

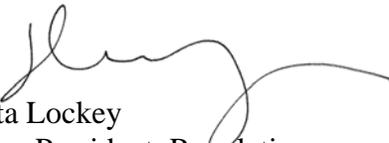
Attn: Filing Center

**RE: UE \_\_\_\_—PacifiCorp’s 2019 Renewable Adjustment Clause—Motion for General Protective Order—Expedited Consideration Requested**

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for General Protective Order with Expedited Consideration Requested. The entry of a general protective order will prevent delay in providing confidential information when PacifiCorp files its 2019 Renewable Adjustment Clause on or about January 2, 2019.

Please direct any inquiries about this filing to Natasha Siores at (503) 813-6583.

Sincerely,



Etta Lockey  
Vice President, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE \_\_\_\_

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

2019 Renewable Adjustment Clause.

MOTION FOR PROTECTIVE ORDER

*Expedited Consideration Requested*

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(7) and OAR 860-001-0080(1), PacifiCorp d/b/a Pacific Power moves the Public Utility Commission of Oregon (Commission) for entry of a standard protective order in this proceeding. PacifiCorp will file its 2019 Renewable Adjustment Clause (RAC) on or before January 2, 2019. Good cause exists to issue a protective order to protect commercially sensitive and confidential business information related to this filing.

The Commission’s rules authorize PacifiCorp to seek reasonable restrictions on discovery of trade secrets and other confidential business information.<sup>1</sup> The Commission’s standard protective order is designed to allow the broadest possible discovery consistent with the need to protect confidential information.<sup>2</sup> PacifiCorp expects to receive discovery requests related to the 2019 RAC, including requests for propriety cost data and models, commercially sensitive pricing information, confidential market analyses and business

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<sup>1</sup> See OAR 860-001-0000(1) (adopting the Oregon Rules of Civil Procedure); 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 “the rights of a party to trade secrets and other confidential commercial information” and “to facilitate the communication of information between litigants”).

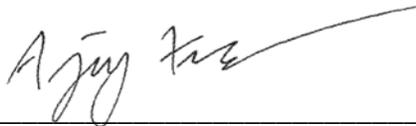
<sup>2</sup> OAR 860-001-0080(2).

projections, or confidential information regarding the procurement of equipment. 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. The company additionally requests expedited consideration of this motion so that a protective order may be in place for PacifiCorp's filing on or before January 2, 2019. Because this is a new filing there are no other parties that have intervened, and as a result no parties have been contacted.

Respectfully submitted this 26<sup>th</sup> day of December, 2018,



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