

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of PacifiCorp
(U 901 E) for Approval of its 2022 Energy Cost
Adjustment Clause and Greenhouse Gas-Related
Forecast and Reconciliation of Costs and Revenue.

Application No. 21-08-004
(Filed August 3, 2021)

**MOTION OF PACIFICORP (U 901 E) FOR LEAVE TO FILE
REPLY BRIEF UNDER SEAL**

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Dated: July 25, 2022

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**MOTION OF PACIFICORP (U 901 E) FOR LEAVE TO FILE
REPLY BRIEF UNDER SEAL**

In accordance with Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission) and in compliance with the schedule set forth by Presiding Administrative Law Judge (ALJ) John Larsen in the above-captioned proceeding in his email Ruling of February 3, 2022, PacifiCorp d/b/a Pacific Power (PacifiCorp) submits this motion for leave to file under seal its Reply Brief in this proceeding, in compliance with the ALJ's previous rulings related to confidential information in this proceeding.

PacifiCorp requests leave to file under seal the gray-shaded material in the Confidential version of its Reply Brief. The text and figures that are shaded gray in the brief are material that PacifiCorp has previously identified as confidential in its testimony and exhibits. All this material was previously granted confidential treatment by a verbal ruling of ALJ Larsen during the May 25, 2022, virtual hearing in this proceeding. Also attached is the Declaration of Michael B. Day attesting to the procedures used to identify the material for which confidential treatment is sought.

PacifiCorp requests leave to file under seal the material identified for redaction in its Confidential version of its Reply Brief so that it may be designated as confidential and provided the protections required under General Order 66-D.

Respectfully submitted July 25, 2022, at San Francisco, California.

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By /s/Michael B. Day
Michael B. Day

Attorneys for PacifiCorp

ATTACHMENT A

**DECLARATION OF MICHAEL B. DAY
IN SUPPORT OF MOTION**

I, Michael B. Day, a Member of the State Bar of California, and a partner of the law firm of Downey Brand, LLP, hereby state under penalty of perjury the following:

1. I am counsel for PacifiCorp d/b/a Pacific Power (PacifiCorp) in Application 21-08-004 now pending before the Public Utilities Commission of the State of California.
2. As counsel for PacifiCorp, I made an oral motion during the virtual hearing in this proceeding on May 25, 2022, for the confidential material in PacifiCorp's testimony and exhibits to be granted confidential treatment. Administrative Law Judge (ALJ) John Larsen granted PacifiCorp's motions for confidential treatment of all the information that is referenced in this Reply Brief.
3. I reviewed the material contained in PacifiCorp's Reply Brief, and prepared the redactions of material in that pleading to identify the specific confidential material that was granted confidential treatment in the previous rulings of presiding ALJ Larsen in this proceeding, including his verbal ruling during the virtual hearing on May 25, 2022. That confidential material is marked by gray shading in the Confidential version of the brief.
5. Therefore, on behalf of PacifiCorp, I request leave to file under seal the Confidential version of PacifiCorp's Reply Brief to maintain the confidentiality of the protected material contained therein.

Signed this 25th day of July, 2022 at San Francisco, California.

Signed



Michael B. Day

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**[PROPOSED] RULING GRANTING PACIFICORP LEAVE TO FILE
REPLY BRIEF UNDER SEAL**

On July 25, 2022, PacifiCorp d/b/a Pacific Power (PacifiCorp) filed its Motion of PacifiCorp For Leave To File Reply Brief Under Seal seeking confidential treatment for the redacted portions of its Reply Brief in the above-captioned proceeding.

Having reviewed PacifiCorp’s Motion, and the Declaration of Michael B. Day, counsel for PacifiCorp, and good cause appearing, PacifiCorp’s Motion is Granted.

The redacted portions of PacifiCorp’s Reply Brief, identified by gray shading in the text, shall be treated as confidential until such time as the Commission orders otherwise.

Dated this ___ day of _____, 2022 at San Francisco, California.

Administrative Law Judge