

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,
v.

PACIFICORP, d/b/a
PACIFIC POWER & LIGHT COMPANY,

Respondent.

Docket UE-220376

PACIFICORP MOTION FOR
STANDARD PROTECTIVE ORDER

I. Relief Requested

I In order to facilitate the timely and appropriate sharing of confidential information between parties, PacifiCorp dba Pacific Power & Light Company (PacifiCorp or the Company) moves for the entry of the Washington Utilities and Transportation Commission's (Commission) standard protective order under WAC 480-07-420(1). PacifiCorp's representatives in this proceeding are:

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II. Discussion

2 On December 30, 2021, PacifiCorp filed its final Clean Energy Implementation
Plan (CEIP) with the Commission.¹ The CEIP included confidential workpapers that
were provided according to WAC 480-07-160. This is consistent with Avista's and Puget
Sound Energy's respective CEIPs, that each provided similar confidential information
pursuant to WAC 480-07-160.

3 On June 6, 2022, the Commission, through its staff (Staff), issued a Complaint
and Notice of Prehearing Conference in Docket UE-220376 (Complaint). The Complaint
alleges that PacifiCorp violated Commission Order 01 in Docket UE-210829,
RCW 19.280.030(3)(a)(ii) and 19.280.030(3)(a)(iii), and WAC 480-100-640(7) and
WAC 480-100-660(4), by failing to incorporate the social cost of greenhouse gases
(SCGHG) in the Company's preferred portfolio.

4 On September 8, 2022, the Commission issued Order 04, that among other things,
established a procedural schedule, opportunities for discovery, and for parties to submit
confidential information. Consistent with Order 04, Commission Staff issued several data
requests to PacifiCorp regarding issues in dispute in this proceeding. These responses
require the Company to provide confidential information to parties in the docket. The
Company also anticipates that future discovery and evidence could require sharing
confidential information between parties.

5 PacifiCorp represents that the information requested in Staff's data requests
should be protected as confidential because it includes valuable commercial information,
including confidential cost and financial information that the Company utilizes to

¹ *In re PacifiCorp's Final CEIP*, Dkt. UE-210829 (Dec. 30, 2021).

conduct modeling for the 2021 Clean Energy Implementation Plan. Disclosure of this information would harm PacifiCorp by providing competitors an unfair competitive advantage. Pending entry of the Commission’s standard protective order in this docket, the Company designated this information as confidential under the Commission’s general rule on confidentiality, WAC 480-07-160, and under RCW 80.04.095.

6 The Commission has authority to grant PacifiCorp’s motion under WAC 480-07-420(1), which allows the Commission to enter “a standard form of protective order to promote the free exchange of information and development of the factual record in a proceeding when the commission finds that parties reasonably anticipate that discovery or evidentiary filings will require information designated as confidential as defined in WAC 480-07-160 to be disclosed to other parties in the adjudication.”

7 The information that PacifiCorp seeks to protect in this case is the type of information that is intended to be eligible for confidential protections under RCW 80.04.095 and WAC 480-07-160: Public release of the confidential information could compromise the Company’s ability to compete fairly and impose business risks to the Company, and increase costs for customers. The Commission has issued a standard protective order for the same or similar information in Puget Sound Energy’s CEIP proceeding.²

III. Conclusion

8 PacifiCorp respectfully requests the Commission enter its standard form of protective order in this case.

² *In re Puget Sound Energy’s CEIP*, Dkt. UE-210795, Order 02 (May 12, 2022).

Dated this 3rd day of October 2022.

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