

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION,

Complainant,

v.

AVISTA CORPORATION, d/b/a AVISTA UTILITIES,

Respondent.

) DOCKET NO. UE-16 \_\_\_\_\_  
) DOCKET NO. UG-16 \_\_\_\_\_  
)  
)  
) AVISTA CORPORATION'S  
) MOTION FOR A PROTECTIVE  
) ORDER PURSUANT TO  
) WAC 480-07-420  
)  
)

1 COMES NOW, Avista Corporation (hereinafter "Avista" or the "Company"), pursuant to WAC 480-07-420, and respectfully moves the Commission for a Protective Order in conjunction with its general rate case filing dated February 18, 2016 (GRC). Service of documents pertaining to this filing should be to the following Avista Corporation representatives:

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2 This Motion is being filed coincident with Avista's general rate case filings in the above-captioned matter, mailed on February 18, 2016. The Company filed revised tariff schedules to effect an increase in its base prices to its electric and gas customers, along with pre-filed direct testimony and exhibits in support of its proposed revisions. The Company identified information contained on a number of pages of these testimonies, exhibits, and workpapers as "Confidential per WAC 480-07-160".

3           The Commission's standard form of protective order should be sufficient to protect the materials in Avista's filing that have been marked "confidential," as well as confidential information that may be disclosed during the pendency of this case. Such designated materials marked confidential contain information that might compromise Avista's ability to compete fairly, or that otherwise might impose a business risk if disseminated without the protections provided in the Commission's protective order. (WAC 480-07-423) Public release of such materials is not in the public interest.

4           The confidential information that Avista is disclosing can be classified as information pertaining to contract prices, terms and conditions, risk management practices, and plant operation data, and, as such, comprises valuable commercial information. In addition, Avista has a licensing agreement with EPIS, Inc., for the use of their AURORA<sub>XMP</sub> Electric Market Model software package used by the Company to determine power supply costs, and can only be shared with licensed users. Moreover, certain information is confidential in that some contract information is prohibited, by the contract terms, from public disclosure. Moreover, customer-specific information may be disclosed that should enjoy confidential protection.

5           Finally, it is anticipated that additional information will be requested of Avista in the discovery process or otherwise provided during the evidentiary phase of this proceeding.

6           WHEREFORE, Avista respectfully requests that the Commission enter a standard protective order in this case.

RESPECTFULLY SUBMITTED this 18<sup>th</sup> day of February, 2016.

  
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David J. Meyer, Vice President and Chief Counsel  
for Regulatory and Governmental Affairs

cc: Service List