

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP DBA PACIFIC POWER &
LIGHT COMPANY,

2023 Power Cost Adjustment Mechanism

Docket UE-24_____

PACIFICORP’S MOTION FOR
STANDARD PROTECTIVE ORDER
(Expedited Treatment Requested)

I. RELIEF REQUESTED

1 In conjunction with its 2023 Power Cost Adjustment Mechanism (PCAM) filing, submitted on June 14, 2024, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) moves for the entry of the standard protective order by the Washington Utilities and Transportation Commission (Commission) under WAC 480-07-420(1). PacifiCorp seeks expedited treatment of this motion to ensure that its confidential information is covered by a standard protective order as promptly as possible.

PacifiCorp’s contact information for this proceeding is:

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II. BACKGROUND AND AUTHORITIES IN SUPPORT

2 On June 14, 2024, PacifiCorp submitted its 2023 PCAM filing. In Order 09 of Docket UE-140762, the Commission approved a PCAM to allow the Company to recover the difference between the actual net power costs incurred to serve Washington customers and the net power costs collected through base rates established in a general

rate case. PacifiCorp's 2023 PCAM filing includes confidential workpapers in support of its filing. Pending entry of the Commission's standard protective order, the Company requests confidential treatment of the information under the Commission's general rule on confidentiality, WAC 480-07-160, and under RCW 80.04.095.

3 The information that PacifiCorp marked "confidential" includes commercially sensitive information regarding the Company's pricing strategy, fuel costs, contracts, reports, and other terms that could be misappropriated by parties for their commercial benefit and to the Company's and its customers' detriment. In discovery, parties to this proceeding may request other types of information that is commercially valuable to the Company or involves confidential information of customers, employees, business counter-parties, or other third-parties. PacifiCorp minimized the amount of information it designated as confidential to promote the ability of the public to review the filing and participate in this case.

4 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 when parties reasonably anticipate that discovery in a proceeding will call for the production of confidential information." There is ample Commission precedent for the entry of protective orders in cases involving the Company's net power costs, including the protective order the Commission entered in PacifiCorp's most recent power cost only rate case.¹

5 The material that PacifiCorp seeks to protect in this case is the type of information that is intended to be eligible for confidential protections under WAC 480-07-420 and

¹ *Wash. Util. & Transp. Comm'n. v. PacifiCorp d/b/a Pacific Power & Light Co.*, Docket No. UE-210402, Order 02 (June 15, 2021).

WAC 480-07-160. Public release of any of the confidential information could compromise the Company's ability to compete fairly and could impose a business risk to the Company. The result would be increased costs for PacifiCorp and, ultimately, its customers.

III. CONCLUSION

6 For the reasons set forth above, PacifiCorp respectfully requests that the Commission enter its standard form of protective order in this case.

Respectfully submitted this 14th day of June 2024.



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