**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

THE WALLA WALLA COUNTRY CLUB,

Complainant,

v.

Docket No. UE-143932

PACIFIC POWER & LIGHT ‎COMPANY’S MOTION FOR ‎STANDARD PROTECTIVE ‎ORDER

PACIFIC POWER & **(Expedited Treatment ‎Requested)‎**

LIGHT COMPANY, a division of

PACIFICORP

Respondent.

**I. RELIEF REQUESTED**

*1* In conjunction with the case filed by Walla Walla County Club (“WWCC”), Pacific Power & Light Company, a division of PacifiCorp (collectively, “Pacific Power” 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). Pacific Power seeks expedited treatment of this motion to ensure that its confidential information is covered by a standard protective order as promptly as possible. Pacific Power’s representatives in this proceeding are:

Confidential per WAC 480-07-160

**REDACTED VERSION**

**REDACTED VERSION**

**REDACTED VERSION**

Confidential per WAC 480-07-160

**REDACTED VERSION**

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**II. BACKGROUND AND AUTHORITIES IN SUPPORT**

*2* On November 18, 2014 WWCC filed a Complaint with the Commission related to Rule 6 of the Pacific Power’s Net Removal Tariff. In response to Data Requests from WWCC, Pacific Power produced information and documents, some of which were marked as confidential. Pending entry of the Commission’s standard protective order, 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.

*3* The information that Pacific Power marked “confidential” includes commercially sensitive information regarding the Company’s facilities, salvage and removal costs, net book value calculations and methodologies, and the methodology for calculating costs to Pacific Power customers. In discovery, WWCC may request other types of information that are commercially valuable to the Company or involve confidential information of customers, employees, business counter-parties or other third-parties.

*4* The Commission has authority to grant Pacific Power’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.” Under WAC 480-07-0423(3)(a), a protective order “is intended to protect information that might compromise a company’s ability to compete fairly or that otherwise might impose a business risk if disseminated” publicly.

*5* The material Pacific Power seeks to protect in this case is the type of information that is intended to be eligible for confidential protections under WAC 480-07-423(3)(a). Public release of any of the confidential information could compromise the Company’s ability to compete fairly and impose a business risk to the Company. The result would be increased costs for Pacific Power and, ultimately, its customers.

**III. CONCLUSION**

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

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| Respectfully submitted this day of June 2015.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Troy Greenfield, WSBA #21578  Claire Rootjes, WSBA #42178  Schwabe Williamson & Wyatt PC  ‎1420 Fifth Avenue, Ste. 3400‎  Seattle, WA 98101‎  Telephone: 206.622.1711‎  Facsimile: 206.292.0460‎  Email: tgreenfield@schwabe.com  Email: crootjes@schwabe.com  Sarah K. Wallace  Vice President & General Counsel  Pacific Power & Light Company  Attorneys for Pacific Power & Light Company |
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding listed below, by email only:

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Dated: June 18, 2015

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Lisa White