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June 18, 2015

VIA UPS OVERNIGHT DELIVERY

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Dr. SW

PO Box 47250

Olympia, WA 98504-7250

Re: The Walla Walla Country Club v Pacific Power & Light Company, a division of
PACIFICORP
Docket No. UE-143932
Our File No.: 114407-192223

Dear Washington:

Enclosed please find the original and four copies of Pacific Power & Light Company's Motion for Standard Protective Order. Thank you for your consideration in this matter.

Very truly yours,

SCHWABE, WILLIAMSON & WYATT, P.C.

Troy Greenfield
Claire L. Rootjes

CBN:lwh

Enclosures

cc: David S. Grossman
Stanley M. Schwartz
Matthew W. Daley
Melinda J. Davison
Jesse E. Cowell

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

THE WALLA WALLA COUNTRY
CLUB,

Complainant,

v.

PACIFIC POWER &
LIGHT COMPANY, a division of
PACIFICORP

Respondent.

Docket No. UE-143932

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

(Expedited Treatment Requested)

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:

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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.

Respectfully submitted this 18th day of June 2015.



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Sarah K. Wallace
Vice President & General Counsel
Pacific Power & Light Company

Attorneys for Pacific Power & Light Company

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



Lisa White