

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP DBA PACIFIC POWER &
LIGHT COMPANY,

2020 Power Cost Adjustment Mechanism

Docket UE-_____

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

I. RELIEF REQUESTED

1 In conjunction with its 2020 Power Cost Adjustment Mechanism (PCAM) filing, submitted on June 15, 2021, PacifiCorp dba 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 are:

Ajay Kumar
Senior Attorney
Pacific Power
825 NE Multnomah Street, Suite 1800
Portland, OR 97232
Phone: (503) 813-5161
ajay.kumar@pacificorp.com

Washington Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
WashingtonDockets@PacifiCorp.com

II. BACKGROUND AND AUTHORITIES IN SUPPORT

2 On June 15, 2021, PacifiCorp submitted its 2020 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 2020 PCAM filing includes confidential workpapers in support of

its filing. Pending entry of the Commission’s standard protective order, the Company requested 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 2014 general rate case.¹

5 The material 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 WAC 480-07-160. Public release of any of the confidential information could compromise the

¹ *Washington Utils. & Trans. Comm. v. PacifiCorp d/b/a Pacific Power & Light Company*, Docket UE-140762, Order 02 (May 14, 2014).

Company's ability to compete fairly and 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 15th day of June 2021.

_____/s/_____
Ajay Kumar
Senior Attorney, OSB# 183903
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Phone: (503) 813-5161
ajay.kumar@pacificorp.com

Attorney for PacifiCorp