

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP D/B/A PACIFIC POWER
& LIGHT COMPANY,

Respondent.

Docket No. _____

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

1 PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp) moves for the entry of the Washington Utilities and Transportation Commission's (Commission) standard protective order in conjunction with PacifiCorp's general rate case filing dated January 11, 2013. PacifiCorp's representatives for purposes of this proceeding are:

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Attorneys for PacifiCorp

I. RELIEF REQUESTED

2 PacifiCorp respectfully requests that the Commission issue its standard form of
protective order in this proceeding. PacifiCorp is submitting as Exhibit A to this motion
a proposed form of protective order.

II. STATEMENT OF FACTS

3 On January 11, 2013, PacifiCorp filed revised tariff schedules to increase base
rates to its Washington customers, along with pre-filed direct testimony and exhibits in
support of the proposed tariff revisions. PacifiCorp marked information contained on
certain pages of these testimonies and exhibits “confidential”.

4 The information that PacifiCorp has marked “confidential” includes commercially
sensitive information regarding PacifiCorp’s fuel costs, embedded costs of long-term
debt, and confidential inputs (such as contract terms, heat rate coefficients, and forward
price curves) to PacifiCorp’s net power cost modeling. Additionally, parties to this
proceeding may request other types of information not listed above that is commercially
valuable to PacifiCorp and that should be protected from public disclosure or disclosure
to persons who might make use of such information to PacifiCorp’s detriment outside the
scope of this proceeding.

5 Release of such information to the public, potential intervenors, or to potential
counterparties of future transactions would harm PacifiCorp and its customers because it
would compromise PacifiCorp’s ability to compete fairly and impose a business risk to
PacifiCorp, *e.g.*, compromise PacifiCorp’s subsequent negotiating and litigation
positions.

6 PacifiCorp respects the Commission’s concern that the confidential designation should not be applied lightly. PacifiCorp has been careful in its filing to minimize the amount of information designated confidential. PacifiCorp believes that the public can generally understand and other parties can productively participate in the proceeding without access to the confidential information.

III. STATEMENT OF ISSUES

7 This Motion for Protective Order presents the following issue: should the Commission enter its standard protective order to protect commercially sensitive information provided by or submitted to PacifiCorp from disclosure or dissemination to the public or potential counterparties to transactions with PacifiCorp.

IV. EVIDENCE RELIED UPON

8 PacifiCorp relies on the pre-filed direct testimony and exhibits in this proceeding. This evidence explicitly shows the content and context of information that PacifiCorp seeks to protect with this motion.

V. AUTHORITY AND ARGUMENT

9 Authority for PacifiCorp’s requested relief is found in WAC 480-07-423, which provides for entry of a protective order to protect information that may compromise a company’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(3)(a).

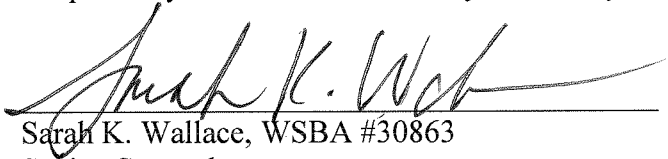
10 There is ample Commission precedent for the entry of a protective order, including the protective order the Commission entered in PacifiCorp’s last general rate case, *WUTC v. PacifiCorp*, Docket No. UE-111190, Order 02 (July 28, 2011).

11 The material PacifiCorp seeks to protect is precisely the type of information that is intended to be eligible for “confidential” protections in WAC 480-07-423(3)(a). The likely result of release of any of the “confidential” information to potential counterparties of PacifiCorp would be increased costs for PacifiCorp and, ultimately, its customers.

VI. CONCLUSION

12 For the reasons set forth above, PacifiCorp respectfully requests that the Commission enter its standard form of protective order in this case, provided as Exhibit A to this motion.

Respectfully submitted this 11th day of January, 2013.



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