

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY, a
division of PacifiCorp.

Respondent.

Docket No. UE-14_____

PACIFIC POWER & LIGHT
COMPANY'S MOTION FOR
STANDARD PROTECTIVE ORDER
(Expedited Treatment Requested)

I. RELIEF REQUESTED

I In conjunction with the general rate case filed by Pacific Power & Light Company, a division of PacifiCorp (collectively, Pacific Power or Company), on May 1, 2014, Pacific Power 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 May 1, 2014, Pacific Power filed revised tariff schedules to increase base rates for
its Washington customers, along with pre-filed direct testimony and exhibits in support of the
proposed tariff revisions. Pacific Power marked information contained on certain pages of
these testimonies and exhibits as confidential. Under WAC 480-07-510(3), the Company
provided workpapers in support of its filing, some portions of which are also marked
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 fuel costs, embedded costs of long-term debt,
and confidential inputs to net power cost modeling (such as contract terms, heat rate
coefficients, and forward price curves). 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. Pacific Power has 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 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

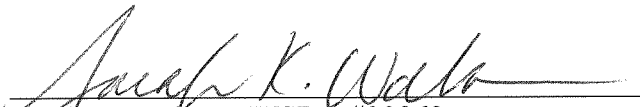
disseminated” publicly. There is ample Commission precedent for the entry of protective orders in general rate cases, including the protective order the Commission entered in Pacific Power’s 2013 general rate case.¹

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 1st day of May 2014.



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¹ *Washington Utils. & Trans. Comm. v. PacifiCorp d/b/a Pacific Power & Light Company*, Docket UE-130043, Order 02 (Jan. 25, 2013).