

July 1, 2011

## VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

David W. Danner Executive Director and Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive S.W. P.O. Box 47250 Olympia, WA 98504-7250

Re: Docket No. UE-111190

Dear Mr. Danner:

Enclosed please find an original and twelve (12) copies of PacifiCorp's Motion for Protective Order for filing in the matter of PacifiCorp's request for a general rate increase, filed on July 1, 2011.

Please do not hesitate to contact me if you have any questions (503) 813-6043.

Sincerely,

Andrea L. Kelly ML Andrea L. Kelly

Vice President, Regulation

**Enclosures** 

Cc: service list

# BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORATION COMMISSION

**DOCKET UE- 111190** 

Complainant,

VS.

PACIFICORP d.b.a. PACIFIC POWER & LIGHT COMPANY,

Respondent.

MOTION FOR PROTECTIVE ORDER

(Expedited Treatment Requested)

Pursuant to WAC 480-07-375 and WAC 480-07-420, PacifiCorp d.b.a. Pacific

Power & Light Company (PacifiCorp or Company), hereby moves for the entry of the Washington Utilities and Transportation Commission's (Commission) standard

protective order in conjunction with the Company's general rate increase filing dated July

1, 2011. The Company's representatives for purposes of the proceeding are:

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Attorneys for PacifiCorp

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The Company respectfully requests, through this motion, that the Commission issue its standard protective order.

3

On July 1, 2011, the Company filed revised tariff schedules to increase base rates to its customers, along with prefiled direct testimony, exhibits and workpapers in support of the proposed tariff revisions. The Company marked one piece of testimony: Direct Confidential Testimony of Cindy Crane, Exhibit No.\_\_\_(CAC-1CT), and a number of workpapers as "confidential" in accordance with the requirements of WAC 480-07-160. These include sensitive information relating to coal costs, the Company's embedded cost of long term debt, and confidential inputs (such as contract terms, heat rate coefficients, and forward price curves) to the Company's net power cost modeling. This information is commercially sensitive and its public release or its use outside of this proceeding could harm the Company and its customers.

4

Additionally, parties to this proceeding may request other types of information not listed above that is commercially valuable to the Company that should be protected from public disclosure or to persons who might make use of such information to the Company's detriment outside the scope of this proceeding.

5

The Company respectfully requests that the Commission expeditiously enter its standard protective order before the prehearing conference so that the Company may be able to provide the confidential exhibits and workpapers to all parties. The entry of the Commission's standard protective order will also facilitate the prompt commencement of discovery in this case.

#### II. CONCLUSION

Wherefore, the Company respectfully requests that the Commission enter on an expedited basis the standard protective order for this proceeding.

DATED: July 1, 2011.

Respectfully Submitted,

Jordan A. White Senior Counsel PacifiCorp

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#### **CERTIFICATE OF SERVICE**

I certify that I have cause to be served the foregoing document, via E-mail, to the following:

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DATED this 1st day of July, 2011

Carrie Meyer

Coordinator, Regulatory Operations