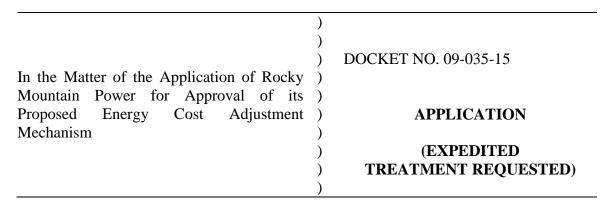
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## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH



## APPLICATION FOR ISSUANCE OF A PROTECTIVE ORDER

Pursuant to Utah Rule of Civil Procedure 26 and the rules of practice and procedure for the Public Service Commission of Utah (the "Commission"), Rocky Mountain Power (or the "Company") hereby makes application to the Commission for the issuance of a protective order in the form attached hereto as Exhibit A. Rocky Mountain Power requests that the Commission issue this protective order on an expedited basis. The grounds for this application are as follows:

1. The issuance of the proposed protective order on an expedited basis will facilitate the disclosure of information by the Company in this docket and will also

facilitate the future exchange of information among the parties to this docket by affording proper protection to information the disclosing party deems to be valuable, confidential, trade secret, and proprietary business information ("Confidential Information").

- 2. Rocky Mountain Power anticipates serving responses to data requests that have already been served on the Company. Some of the responses may refer to Confidential Information and the Company will provide this information upon the Commission issuing a protective order in this proceeding. Entry of the proposed protective order on an expedited basis will facilitate the exchange of this information in this docket.
- 3. The proposed protective order is fair and equitable to all parties and provides the parties and the Commission with access to information while allowing for the protection of the integrity of confidential information. The issuance of the proposed protective order will also afford protection to the Commission as well as parties to this docket who might review the information and subsequently be requested to reveal its contents inasmuch as the proposed protective order sets forth parameters for the use and disclosure of Confidential Information.
- 4. The proposed protective order is in substantially the same form as the protective order template that was issued by the Commission July 30, 2008.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission issue the proposed protective order in the form attached hereto as Exhibit A on an expedited basis.

DATED this 16th day of April, 2009.

Respectfully submitted,

## ROCKY MOUNTAIN POWER

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Attorney for Rocky Mountain Power

## CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April 2009, I caused to be e-mailed a true and correct copy of the foregoing Application for Issuance of a Protective order of Rocky Mountain Power to the following:

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