Yvonne R. Hogle (7550) Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake City, Utah 84111 Telephone: (801) 220-4050 Facsimile: (801) 220-3299 yvonne.hogle@pacificorp.com

Attorney for Rocky Mountain Power

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	
In the Matter of the Acknowledgment of )	DOCKET NO. 09-2035-01
PacifiCorp's Integrated Resource Plan )	MOTION FOR PROTECTIVE ORDER
)	AND REQUEST FOR EXPEDITED
)	TREATMENT
)	

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 moves the Commission to enter 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 motion are as follows:

1. The Company has received written data requests requesting proprietary

information.

2. The entry of a protective order on an expedited basis will expedite and facilitate the exchange of information by the parties by affording protection to this proprietary information, as well as other valuable, confidential, trade secret, and proprietary and competitive business information that may be requested in the future.

3. Rocky Mountain Power has attached a proposed protective order to this motion as Exhibit A. 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 information designated as confidential information or highly confidential information.

4. The proposed protective order is in substantially the same form as the Commission issued template for protective orders distributed by the Commission on April 22, 2009.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission enter the protective order in the form attached hereto on an expedited basis.

DATED this 12th day of May, 2009.

Respectfully submitted,

ROCKY MOUNTAIN POWER

By \_\_\_

Yvonne R. Hogle, Esq. (7550) 201 South Main Street, Suite 2300 Salt Lake City, Utah 84111 Telephone No. (801) 220-4050 Facsimile No. (801) 220-3299 Yvonne.hogle@pacificorp.com

Attorney for Rocky Mountain Power

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of May 2009, a true copy of the foregoing

## Motion for Protective Order and Request for Expedited Treatment was transmitted

via electronic mail to the following:

Michael Ginsberg, Esq. Assistant Attorney General Patricia E. Schmid, Esq. Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, Utah 84114 <u>mginsberg@utah.gov</u> <u>pschmid@utah.gov</u>	Utah Ratepayers Alliance c/o Betsy Wolf Salt Lake community Action Program 764 South 200 West Salt Lake City, Utah 84101 <u>bplenk@igd.org</u>
Gary A. Dodge Hatch James & Dodge 10 West Broadway, Suite 400 Salt Lake City, Utah 84101 gdodge@hjdlaw.com	Paul H. Proctor, Esq. Assistant Attorney General 500 Heber M. Wells Building 160 East 300 South Salt Lake City, Utah 84111 pproctor@utah.gov
Steven Michel Western Resource Advocates 2260 Baseline Road, Suite 200 Boulder, Colorado 80302 <u>smichel@westernresource.org</u>	Richard Collins Westminster College 1840 South 1300 East Salt Lake City, Utah 84105 <u>rcollins@westminstercollege.edu</u>
F. Robert Reeder Vicki Baldwin PARSONS BEHLE & LATIMER One Utah Center 201 South Main Street, Suite 1800 P.O. Box 45898 Salt Lake City, Utah 84145-0898 <u>BobReeder@pblutah.com</u> <u>VBaldwin@pblutah.com</u>	Sarah Wright Utah Clean Energy 917 2 <sup>nd</sup> Avenue Salt Lake City, Utah 84103 <u>sarah@utahcleanenergy.org</u>