

John M. Eriksson
Edward A. Hunter
STOEL RIVES LLP
201 South Main Street, Suite 1100
Salt Lake City, Utah 84111
Telephone: (801) 328-3131
Facsimile (801) 578-6999

Attorneys for PacifiCorp

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of)
PACIFICORP for Approval of an IRP) MOTION FOR PROTECTIVE ORDER
Based Avoided Cost Methodology for)
QF Projects Larger Than 1 Megawatt) Docket No. 03-035-14

PacifiCorp doing business as Utah Power & Light ("PacifiCorp" or the "Company"), hereby moves the Commission to enter a Protective Order in this docket, in the form attached hereto. The grounds for this motion are as follows:

1. It is anticipated that the parties will engage in discovery that may request the production of information that is proprietary in nature. The entry of the proposed Protective Order will expedite and facilitate the exchange of information by the parties, by affording protection to valuable confidential, trade secret, and proprietary business information.
2. The entry of the proposed Protective Order will also afford protection to the Commission, as well as parties who might review the information and subsequently be requested to reveal its contents, inasmuch as the proposed Protective Order sets forth clear parameters for use of confidential information.
3. The entry of the proposed Protective Order will enable the Commission to adequately review the information that is provided pursuant to the Protective Order so that it may have sufficient information upon which to make decisions.

4. The proposed Protective Order is fair and equitable to all parties.

5. The proposed Protective Order is in the same form as the Revised Protective Order entered by the Commission in Docket No. 03-2035-02 on July 10, 2003.

Based on the foregoing PacifiCorp requests that the Commission enter the Protective Order in the form attached hereto.

Respectfully submitted this ____ day of December, 2003.

John M. Eriksson
Edward A. Hunter
Stoel Rives LLP

Attorneys for PacifiCorp

CERTIFICATE OF SERVICE

I hereby certify that on this ___ day of December, 2003, I caused to be served by U. S. Mail, postage prepaid, true and correct copies of the foregoing **MOTION FOR PROTECTIVE ORDER** to the following:

Reed Warnick
Assistant Attorney General
Utah Committee of Consumer Services
Heber M. Wells Bldg., Fifth Floor
160 East 300 South
Salt Lake City, UT 84111

Michael Ginsberg
Assistant Attorney General
Utah Division of Public Utilities
Heber M. Wells Bldg., Fifth Floor
160 East 300 South
Salt Lake City, UT 84111

F. Robert Reeder
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, UT 84111

Roger Swenson
US Magnesium Corporation
238 North 2200 West
Salt Lake City, UT 84116-2921
