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Joint Counsel for MidAmerican Energy  
Holdings Company and PacifiCorp dba  
Utah Power & Light Company

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Application of	)	DOCKET NO. 05-035-54
MidAmerican Energy Holdings Company and	)	
PacifiCorp dba Utah Power & Light	)	<u>MOTION FOR PROTECTIVE ORDER</u>
Company for an Order Authorizing Proposed	)	<u>AND REQUEST FOR EXPEDITED</u>
Transaction	)	<u>TREATMENT</u>

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MidAmerican Energy Holdings Company and PacifiCorp (hereinafter jointly referred to as the “Applicants”) hereby move the Public Service Commission of Utah (the “Commission”) to enter a Protective Order in the form attached hereto. Applicants request that the Commission issue this Protective Order on an expedited basis. The grounds for this Motion are as follows:

1. The entry of the proposed Protective Order on a facilitated basis 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 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.

3. The proposed Protective Order is in the same form as Protective Orders entered by the Commission in recent cases involving this and other utilities under its jurisdiction, including the Protective Order entered in PacifiCorp's last general rate case.

WHEREFORE, the Applicants request that the Commission enter the Protective Order in the form attached hereto on an expedited basis.

RESPECTFULLY SUBMITTED this \_\_\_\_\_ day of July, 2005

By \_\_\_\_\_  
Edward A. Hunter  
Jennifer H. Martin  
STOEL RIVES LLP

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing MOTION FOR ENTRY OF PROTECTIVE ORDER to be served upon the following via United States mail, postage prepaid at the addresses below on July \_\_\_\_, 2005:

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