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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations	Docket No. 09-035-23 MOTION FOR ENTRY OF PROTECTIVE ORDER
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Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”), pursuant to Utah Rule of Civil Procedure 26, the rules of practice and procedure of the Public Service Commission of Utah (“Commission”) and the Stipulation Regarding Revenue Requirement (“Stipulation”) filed on March 23, 2009 in Docket No. 08-035-38, requests the Commission to enter a protective order in the form attached hereto as Attachment 1 to govern the provision and use of confidential information in this docket (“Motion”). The grounds for this Motion are as follows:

1. On April 16, 2009, Rocky Mountain Power filed its Notice of Intent to File General Rate Case and Request for Approval of Test Period in this matter.

2. In the Stipulation, the Company agreed:

15. Next Case Filing Requirements. In relation to the filing of Rocky Mountain Power's next general rate case, the Company agrees to:

....

c. In conjunction with the notice of intent filing, file with the Commission a motion for issuance of a protective order and draft protective in order to give the Commission the opportunity to issue the protective order prior to the date Rocky Mountain Power files its next rate case.

3. The issuance of the proposed protective order will facilitate the disclosure of information by the Company related to its general rate case application 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 confidential, trade secret, and proprietary business information ("Confidential Information").

4. 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 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.

5. The terms and conditions of the Protective Order are the same as those in the protective orders issued by the Commission in Docket No. 08-035-38 and other recent dockets before the Commission.¹

¹ One non-substantive change was made, renumbering subparagraph 5(A) as 5 because there are

BASED ON THE FOREGOING, Rocky Mountain Power requests that the Commission issue a protective order in the form attached hereto as Attachment 1 to govern the provision and use of confidential information in this docket in the public interest.

DATED this 16th day of April, 2009.

Respectfully submitted,

ROCKY MOUNTAIN POWER

Yvonne R. Hogle
Daniel Solander
Rocky Mountain Power

Gregory B. Monson
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Attorneys for Rocky Mountain Power

no other subparagraphs in paragraph 5.

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 by electronic mail to the addresses shown below on April 16, 2009:

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