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*Attorneys for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Rocky Mountain Power for Approval of Pole Attachment Agreement between PacifiCorp and TCG Utah	DOCKET NO. _____ <b>MOTION FOR ENTRY OF PROTECTIVE ORDER</b>
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Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”), requests the Commission to enter the attached Protective Order to govern the provision and use of confidential information in this docket (“Motion”). This Motion is based upon the following:

1. Rocky Mountain Power is filing this Motion for Entry of a Protective Order concurrently with a Notice of Intent to File an Application for Approval of Pole Attachment Agreement between PacifiCorp and TCG Utah (“the Application”).

2. The Application will contain confidential financial and competitive information. The Pole Attachment Agreement between Rocky Mountain Power and TCG Utah (“the Agreement”) contains confidential information and includes a confidentiality clause, requiring each of the parties to the Agreement to keep strictly confidential the terms of the Agreement. However, it is anticipated that no other information will be requested by the parties or by the Commission in this docket.

3. The Commission's rules authorize Rocky Mountain Power to seek reasonable restrictions on discovery of confidential business information. *See* R746-100-8.C.3 (recognizing that the Commission may, on its own motion or that of a party convene a conference to establish the scope, need for, and terms of a protective order).

4. Entry of the order requested in this Motion is in the public interest to expedite the production of confidential information and to afford protection to confidential commercial, financial and competitive information.

5. 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 in as much as the proposed protective order sets forth parameters for the use and disclosure of confidential information.

BASED ON THE FOREGOING, Rocky Mountain Power requests that the Commission issue the attached Protective Order in this docket in the public interest.

DATED this 16th day of June, 2009.

Respectfully submitted,

ROCKY MOUNTAIN POWER

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Mark C. Moench  
Barbara Ishimatsu  
Rocky Mountain Power

*Attorneys for Rocky Mountain Power*

**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 or U.S. postage to the addresses shown below on June 16, 2009:

TCG Utah Attn: Legal Dept Room 3A118a One AT&T Way Bedminister New Jersey 07921	Paul Proctor Office of Consumer Services Heber M. Wells Bldg., Fifth Floor 160 East 300 South Salt Lake City, UT 84111 <a href="mailto:pproctor@utah.gov">pproctor@utah.gov</a>
Cheryl Murray Dan Gimble Michele Beck Office of Consumer Services 160 East 300 South, 2 <sup>nd</sup> Floor Salt Lake City, UT 84111 <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a> <a href="mailto:dgimble@utah.gov">dgimble@utah.gov</a> <a href="mailto:mbeck@utah.gov">mbeck@utah.gov</a>	Michael Ginsberg Patricia Schmid Assistant Attorney General Utah Division of Public Utilities Heber M. Wells Bldg., Fifth Floor 160 East 300 South Salt Lake City, UT 84111 <a href="mailto:mginsberg@utah.gov">mginsberg@utah.gov</a> <a href="mailto:pschmid@utah.gov">pschmid@utah.gov</a>
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