

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
BEFORE THE
BONNEVILLE POWER ADMINISTRATION

2020 Rate Proceeding

)

Docket No.: BP-20

JOINT MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 1010.12(d) of the Bonneville Power Administration Rules of Procedure, Sacramento Municipal Utility District, Turlock Irrigation District and the Transmission Agency of Northern California (collectively, “JP01”) and the Bonneville Power Administration (“BPA”) hereby jointly move the Hearing Officer for a protective order to cover certain copyrighted, proprietary, or otherwise commercially sensitive and confidential information (“Commercially Sensitive Information”) that JP01 would provide to BPA in a response to certain data requests. Such a protective order would also apply to Commercially Sensitive Information provided by JP01 to any other party in the above-captioned proceeding (the “Proceeding”) and Commercially Sensitive Information provided to JP01 in response to certain data requests.

Upon the entry of the protective order, all parties to the Proceeding executing agreements to be bound by the protective order will have the ability to provide and receive Commercially Sensitive Information, the disclosure of which may be commercially harmful to the disclosing entity.

BPA’s agreement to the terms of the proposed protective order is based on the specific data requests referred to above and BPA’s limited need for JP01’s Commercially Sensitive Information. BPA’s support for entry of the proposed protective order in this proceeding should not be construed as endorsement of the use of this form of protective order in any future proceeding.

WHEREFORE, JP01 and BPA hereby jointly move the Hearing Officer enter an Order substantially similar to the proposed Order attached as Attachment 1 to this Motion.

Dated: March 7, 2019

Respectfully submitted,

/s/ Matthew Perkins

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