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*Attorney for Rocky Mountain Power*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

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	)	CASE NO. PAC-E-23-02
IN THE MATTER OF THE	)	
APPLICATION FOR APPROVAL OF	)	ATTORNEY’S CERTIFICATE
THE ASSET TRANSFER AGREEMENT	)	CLAIM OF CONFIDENTIALITY
BETWEEN ROCKY MOUNTAIN	)	RELATING TO DISCOVERY
POWER AND THE CITY OF IDAHO	)	RESPONSES
FALLS – BELLIN ROAD	)	
	)	
	)	
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I, Joe Dallas , represent Rocky Mountain Power in the above captioned matter. I am an attorney for Rocky Mountain Power.

I make this certification and claim of confidentiality regarding the response to the attached Idaho Public Utilities Commission Staff discovery request pursuant to IDAPA 31.01.01 because Rocky Mountain Power, through its response, is disclosing certain information that is Confidential and/or constitutes Trade Secrets as defined by Idaho Code Section 74-101, et seq. and 48-801 and protected under IDAPA 31.01.01.067 and 31.01.01.233. Specifically, Rocky Mountain Power asserts that the attachment provided with the Company’s response to IPUC data requests 3 and 5 contains Company proprietary information that could be used to its commercial disadvantage.

Rocky Mountain Power herein asserts that the aforementioned response contains confidential in that the information contains Company proprietary information.

I am of the opinion that this information is “Confidential,” as defined by Idaho Code Section 74-101, et seq. and 48-801, and should therefore be protected from public inspection, examination and copying, and should be utilized only in accordance with the terms of the Protective Agreement in this proceeding.

DATED this 30<sup>t</sup> day of March, 2023.

Respectfully submitted,

By

A handwritten signature in blue ink, appearing to read "Joe Dallas", is written over a horizontal line.

Joe Dallas  
Senior Attorney  
Rocky Mountain Power