

Joe Dallas (ISB# 1033)
Rocky Mountain Power
825 NE Multnomah, Suite 2000
Portland, OR 97232
Telephone: 360-560-1937
Email: joseph.dallas@pacificorp.com

Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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)	
)	CASE NO. PAC-E-24-06
IN THE MATTER OF THE)	
APPLICATION OF ROCKY)	ATTORNEY’S CERTIFICATE
MOUNTAIN POWER FOR)	CLAIM OF CONFIDENTIALITY
APPROVAL OF THE TRANSFER OF)	RELATING TO DISCOVERY
PORTIONS OF THE NORTH)	RESPONSES
TEMPLE PROPERTY AND)	
ACCOUNTING ORDER)	
)	
)	

I, Joe Dallas, represent Rocky Mountain Power in the above captioned matter. I am a senior 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 the Company’s response IPUC Audit Data Requests Nos. 6, 7, 9, and 11 contain Company proprietary information that could be used to its commercial disadvantage.

Rocky Mountain Power herein asserts that the aforementioned responses contain 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 5th day of June, 2024.

Respectfully submitted,

By 

Joe Dallas
Senior Attorney
Rocky Mountain Power