

McDowell Rackner & Gibson PC



LISA RACKNER
Direct (503) 595-3925
lisa@mcd-law.com

December 30, 2011

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Dockets UG 221 – Northwest Natural Gas Company Application for a General Rate Revision

Attention Filing Center:

Attached for filing in the above captioned docket is the original and one copy of Northwest Natural's Motion for Protective Order.

Please contact this office with any questions.

Very truly yours,

A handwritten signature in black ink, reading "Lisa Rackner", is written over the typed name below.

Lisa Rackner

Enclosure

1 projections, confidential employee data, confidential information regarding contracts for the
2 purchase or sale of natural gas, and commercially sensitive vendor contracts. Public
3 disclosure of the confidential information could be detrimental to NW Natural and its
4 customers.

5 3. It is substantially likely that Commission Staff and others in this proceeding will
6 seek to discover confidential business information. "The Commission's standard blanket
7 protective order is designed to facilitate discovery in cases involving discovery of large
8 numbers of documents." *See In re Portland Extended Area Service Region*, Docket UM 261,
9 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of
10 relevant information and expedite the discovery process.

11 For the foregoing reasons, NW Natural requests entry of the Commission's General
12 Protective Order in this docket.

13
14
15 DATED: December 30, 2011.

MCDOWELL RACKNER & GIBSON PC



Lisa F. Rackner
Amie Jamieson

NORTHWEST NATURAL GAS COMPANY

Mark Thompson
Manager, Rates and Regulatory
220 NW Second Ave
Portland, OR 97209

Attorneys for NW Natural

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in UG 221 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her e-mail address(es) indicated below.

Jason W. Jones, Assistant AG
Department of Justice
jason.w.jones@state.or.us

Robert Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

Judy Johnson
OPUC Staff
judy.johnson@state.or.us

Catriona McCracken
Citizens' Utility Board of Oregon
catriona@oregoncub.org

Carla Bird
OPUC Staff
carla.bird@state.or.us

Paula E Pyron
Executive Director
Northwest Industrial Gas Users
ppyron@nwigu.org

Chad Stokes
Cable Huston Benedict
Haagensen & Lloyd
cstokes@cablehuston.com

DATED: December 30, 2011



Amie Jamieson
McDowell Rackner & Gibson PC