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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

e: 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,

Lisa Rackner

Enclosure

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON		
2	UG 221		
3	In the Matter of		
4	NORTHWEST NATURAL GAS MOTION FOR GENERAL		
5	COMPANY PROTECTIVE ORDER		
6 _	Application for a General Rate Revision.		
7			
8	Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Northwest Natural Gas Compan		
9	("NW Natural" or "Company") moves for the entry of the Public Utility Commission of Oregon's		
0	("Commission") general protective order in this proceeding. Good cause exists to issue		
1	Protective Order to protect commercially sensitive and confidential business information		
2	related to the Company's concurrently filed general rate case.		
3	In support of this Motion, the Company states:		
4	1. The Commission's rules authorize NW Natural to seek reasonable restrictions of		
5	discovery of trade secrets and other confidential business information. See OAR 860-001		
6	0080; ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets of		
7	other confidential research, development, or commercial information"). See also In		
8	Investigation into the Cost of Providing Telecommunication Service, Docket UM 351, Ord		
9	No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect "tl		
20	rights of a party to trade secrets and other confidential commercial information" and "t		
21	facilitate the communication of information between litigants").		
22	2. Concurrent with this Motion, on December 30, 2011, NW Natural filed its gener		
23	rate case to revise its schedules of rates and charges for providing natural gas service i		
24	Oregon. It is expected that certain documents related to the rate case filing will contain		
25	confidential material, including but not limited to proprietary cost data and mode		

commercially sensitive load projections, confidential market analyses and business

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2	purchase or sale of natural gas, and	commercially sensitive vendor contracts. Public	
3	disclosure of the confidential informati	on 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	D. WED. D	Manager Brands & Ornany BO	
15	DATED: December 30, 2011.	MCDOWELL RACKNER & GIBSON PC	
16		hisa Ku Kr	
17		Lisa F. Rackner	
18		Amie Jamieson	
19		NORTHWEST NATURAL GAS COMPANY	
20		Mark Thompson	
21		Manager, Rates and Regulatory 220 NW Second Ave	
22		Portland, OR 97209	
23		Attorneys for NW Natural	
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projections, confidential employee data, confidential information regarding contracts for the

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1 **CERTIFICATE OF SERVICE** 2 I hereby certify that I served a true and correct copy of the foregoing document in 3 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. 5 Jason W. Jones, Assistant AG Robert Jenks 6 Citizens' Utility Board of Oregon Department of Justice bob@oregoncub.org jason.w.jones@state.or.us 7 Judy Johnson Catriona McCracken 8 **OPUC Staff** Citizens' Utility Board of Oregon judy.johnson@state.or.us catriona@oregoncub.org 9 Carla Bird Paula E Pyron 10 **OPUC Staff Executive Director** Northwest Industrial Gas Users carla.bird@state.or.us 11 ppyron@nwigu.org 12 Chad Stokes 13 Cable Huston Benedict Haagensen & Lloyd 14 cstokes@cablehuston.com 15 16 17 DATED: December 30, 2011 Amie Jamieson 18 McDowell Rackner & Gibson PC 19 20 21

Page 1 - CERTIFICATE OF SERVICE

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