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October 24, 2014

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
3930 Fairview Industrial Drive SE
Post Office Box 1088
Salem, Oregon 97308-1088

Attn: Filing Center

**Re: AR 583 - Rulemaking
eFiling and Other Housekeeping Changes**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), submits the following comments in the above-referenced docket. Except as noted below, the Company supports the eFiling and other housekeeping changes as proposed.

Confidential Documents. NW Natural appreciates the proposed changes surrounding electronic filing and the effort to reduce or eliminate the submission of paper documents. However, with regard to the filing of confidential documents, we have concerns about the proposed changes to 860-001-0170(f) and (g). Specifically, as proposed, the revised rule would require a party in a proceeding to choose one of the following options in order to ensure that a redacted confidential document is accepted for filing:

- a. File the un-redacted confidential document electronically by email on the same day;
- b. Hand-deliver the un-redacted confidential document in print form or on a CD or DVD on the same day as the email filing; or
- c. Mail the un-redacted confidential document in advance of the day that the redacted version is filed electronically by email.

Absent the use of document encryption or a secure way to directly upload such documents onto the Commission’s website, it is unlikely that NW Natural would choose to file un-redacted confidential documents electronically by email. Further, in the normal course of preparing filings for submission, an end of day electronic submission is not unheard of - and is quite often unavoidable - making it simply not practical to plan an advance mailing of un-redacted confidential documents or to be able to hand-deliver the documents on the same date as the email filing.

With the above comments in mind, NW Natural respectfully requests that the Commission leave the existing rule language in place, or in the alternative, consider the following changes:

(f) If a document contains confidential information, then a redacted version will be accepted for electronic filing. ~~but only if the original~~ The un-redacted confidential document is personally delivered or sent by first class mail, postage prepaid, must be received by the Filing Center on the date the redacted document is electronically filed, within two business days of the date the redacted document was electronically filed.

(g) If an entire filing is confidential, then a cover letter will be accepted for electronic filing. The un-redacted confidential filing must be received by the Filing Center within two business days of the date the cover letter was electronically filed., ~~but only if the original confidential document is received by the Filing Center on the date the cover letter is electronically filed.~~

Electronic Documents. There are several rules that specify CD or DVD as the alternative electronic submission option. As written, the rules would preclude any other form of electronic submission, such as on a USB flash drive. So that the rule is not overly prescriptive, NW Natural suggests that the Commission consider adding a reference to allow the use of other types of portable data storage devices. An example of this is provided for 860-001-0070 below:

(3) Unless otherwise provided by Commission order, confidential information submitted under this rule must be **clearly labeled on each electronic page as confidential and identified as confidential in the document name**, or printed on yellow paper, separately bound, and placed in a sealed container **or provided on a CD, ~~or~~ DVD, or other portable data storage device clearly labeled with the word CONFIDENTIAL and placed in a sealed container.**

Dispute Resolution. With regard to 860-021-0015 Dispute Resolution, the changes to this rule are far more extensive than any of the other proposed rule changes and appear to go beyond the housekeeping premise of this docket. Because the Company is not aware of any concerns with the rule as currently written, we respectfully request that these revisions be addressed in a separate proceeding to allow Staff, the utilities, and other parties sufficient opportunity for further review and discussion.

NW Natural appreciates the opportunity to comment in this matter. Please contact me should you have any questions about these comments.

Sincerely,

NW NATURAL

/s/ Onita King

Onita R. King
Sr. Regulatory Compliance Consultant
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