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January 29, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High St SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

Re: LC ____; *In the Matter of Northwest Natural Gas Company's 2016 Integrated Resource Plan*

Please find enclosed the Northwest Natural Gas Company's d/b/a NW Natural ("Company") motion for protective order. The Company intends to file an Integrated Resource Plan ("IRP") on or about August 29, 2016. Prior to filing, the Company intends to provide confidential information to interested parties. Accordingly, the Company requests the Commission grant the enclosed motion for protective order. Because a docket number has not yet been assigned to this matter, NW Natural also requests that the Commission establish a docket number to govern this proceeding.

The Company also requests that discovery in this matter be managed through the Commission's Huddle website.

As indicated on the attached service list, a copy of this filing is being served on all parties to the Company's last general rate case, UG 221.

Please address correspondence on this matter to me with copies to the following:

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220 NW Second Avenue
Portland, Oregon 97209
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Telephone: (503) 226-4211, ext. 3589
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Sincerely,

/s/ Mark R. Thompson

Mark R. Thompson
Manager, Rates and Regulatory Affairs

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC _____

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba, NW NATURAL

2016 Integrated Resource Plan.

MOTION FOR PROTECTIVE ORDER

Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Northwest Natural Gas Company (“NW Natural” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s (“Commission”) general protective order in this proceeding. The Company intends to file its 2016 Integrated Resource Plan (“IRP”) on or about August 29, 2016. Prior to filing the IRP, the Company intends to provide confidential information to stakeholders through discovery and to facilitate IRP workshops. Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information related to NW Natural’s 2016 IRP.

In support of this Motion, the Company states:

1. The Commission’s rules authorize NW Natural to seek reasonable restrictions on discovery of trade secrets and other confidential business information. See OAR 860-001-0080; ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other confidential research, development, or commercial information”). See also *In re Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing

that protective orders are a reasonable means to protect “the rights of a party to trade secrets and other confidential commercial information” and “to facilitate the communication of information between litigants.”

2. NW Natural expects to receive discovery requests in this proceeding, including requests for proprietary cost data and models, commercially sensitive pricing information, and confidential market analyses and business projections. This confidential business information is of significant commercial value, which could expose the Company to competitive injury if disclosure is unrestricted. Issuance of a protective order will facilitate the production of relevant information and expedite the discovery process.

For the foregoing reasons, NW Natural requests entry of a standard Protective Order in this proceeding.

Respectfully submitted this 29th day of January, 2016.

NW NATURAL

/s/ Zachary D. Kravitz
Zachary D. Kravitz,
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Attorney for Northwest Natural Gas Company

 **NW Natural**
CERTIFICATE OF SERVICE

I hereby certify that I have this day served by electronic mail the foregoing Motion for Protective Order for NW Natural's 2016 Integrated Resource Plan upon all parties of record in the Company's most recent general rate case, UG 221.

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DATED at Portland, Oregon, this 29th day of January 2016.

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