



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

February 10, 2017

PUC Filing Center  
Public Utility Commission of Oregon  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: UM 1804: Application of Northwest Natural Gas Company for Approval of Corporate Reorganization to Create a Holding Company**

Attention Filing Center:

Enclosed for filing in docket UM 1804 is an electronic copy of NW Natural Gas Company's Motion for Protective Order.

Please do not hesitate to contact me if you have any questions about this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa Rackner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lisa Rackner



1           2.    On February 10, 2017, the NW Natural filed an Application for Approval of  
2 Corporate Reorganization to Create a Holding Company. NW Natural anticipates that  
3 discovery in this proceeding will include requests for proprietary business and financial  
4 information. NW Natural will be exposed to competitive injury if it is forced to make  
5 unrestricted disclosure of its confidential business information. "The Commission's standard  
6 blanket protective order is designed to facilitate discovery in cases involving discovery of large  
7 numbers of documents." See *In re Portland Extended Area Service Region*, Docket UM 261,  
8 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of  
9 relevant information and expedite the discovery process.

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

12 February 10, 2017

13 **MCDOWELL RACKNER & GIBSON PC**

14 

15 Lisa F. Rackner  
16 Attorneys for Northwest Natural Gas Company

17 NORTHWEST NATURAL GAS COMPANY  
18 Zachary Kravitz  
19 Associate Counsel  
20 220 NW Second Ave  
21 Portland, OR 97209

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in UM 1804 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

Tommy A. Brooks  
Cable Huston Benedict Haagensen & Lloyd  
tbrooks@cablehuston.com

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

OPUC Dockets  
Citizens' Utility Board Of Oregon  
dockets@oregoncub.org

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

Dated: February 10, 2017

  
\_\_\_\_\_  
Wendy McIndoo  
Office Manager