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January 19, 2018

**VIA ELECTRONIC FILING**

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

**Re: Docket No. UP 361: Northwest Natural Gas Company's Motion for Protective Order.**

Attention Filing Center:

Attached for filing in the above-referenced docket is an electronic copy of Northwest Natural Gas Company's Motion for Protective Order.

Please contact this office with any questions.

Very truly yours,

A handwritten signature in blue ink that reads "Alisha Till". The signature is written in a cursive, flowing style.

Alisha Till  
Administrative Assistant

Attachment

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UP 361

In the Matter of

NW NATURAL GAS COMPANY,

Application for Approval of the Acquisition of  
Salmon Valley Water Company.

**MOTION FOR PROTECTIVE ORDER**

Expedited Consideration Requested

1 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Northwest Natural Gas Company  
2 (“NW Natural” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s  
3 (“Commission”) general protective order in this proceeding. Good cause exists to issue a  
4 Protective Order to protect commercially sensitive and confidential business information  
5 related to the Company’s Application for Approval of the Acquisition of Salmon Valley Water  
6 Company, an Oregon water utility (“Application”).

7 In support of this Motion, the Company states:

8 1. The Commission’s rules authorize NW Natural to seek reasonable restrictions on  
9 discovery of trade secrets and other confidential business information. See 860-001-0080;  
10 ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets or other  
11 confidential research, development, or commercial information”); see also *In re Investigation*  
12 *into the Cost of Providing Telecommunication Service*, Docket UM 351, Order No. 91-500  
13 (1991) (recognizing that protective orders are a reasonable means to protect “the rights of a  
14 party to trade secrets and other confidential commercial information” and “to facilitate the  
15 communication of information between litigants”).

16 2. On January 17, 2018, NW Natural filed an Application for Approval of the  
17 Acquisition of Salmon Valley Water Company. NW Natural anticipates that discovery in this  
18 proceeding will include requests for proprietary business and financial information. NW Natural

1 will be exposed to competitive injury if it is forced to make unrestricted disclosure of its  
2 confidential business information. "The Commission's standard blanket protective order is  
3 designed to facilitate discovery in cases involving discovery of large numbers of documents."  
4 See *In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).  
5 Issuance of a protective order will facilitate the production of relevant information and expedite  
6 the discovery process.

7 For the foregoing reasons, NW Natural requests entry of a general protective order in  
8 this docket.

DATED: January 19, 2018

**MCDOWELL RACKNER GIBSON PC**



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