

# McDowell Rackner & Gibson PC



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June 6, 2013

## VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

Re: Docket UM 1654 – In the Matter of Northwest Natural Investigation of Interstate  
Storage and Optimization Sharing

Attention Filing Center:

Enclosed for filing in the above-referenced docket are an original and one copy of NW Natural's  
Motion for General Protective Order.

A copy of this filing has been served on all parties to this proceeding as indicated on the  
enclosed Certificate of Service.

Please contact this office with any questions.

Very truly yours,

A handwritten signature in blue ink that reads "Wendy McIndoo".

Wendy McIndoo  
Office Manager

Enclosure

cc: Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 1654**

4 In the Matter of NW NATURAL  
5 Investigation of Interstate Storage and  
6 Optimization Sharing

**MOTION FOR  
GENERAL PROTECTIVE ORDER**

7 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Northwest Natural Gas Company  
8 (“NW Natural” or “Company”) moves for the entry of the Public Utility Commission of Oregon’s  
9 (“Commission”) general protective order in this proceeding. Good cause exists to issue a  
10 Protective Order to protect commercially sensitive and confidential business information  
11 related to the Company’s interstate storage and optimization activities.

12 In support of this Motion, the Company states:

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

21 2. On May 13, 2013, the Commission opened this docket pursuant to Order No. 12-  
22 408 in Docket UG 221, the Company’s most recent general rate case.<sup>1</sup> In that order, the  
23 Commission adopted a stipulation among NW Natural, Commission Staff, the Citizens’ Utility  
24

25 <sup>1</sup> NW Natural Gas Co. Request for a General Rate Revision, Docket UG 221, Order No. 12-408  
26 (Oct. 26, 2012).

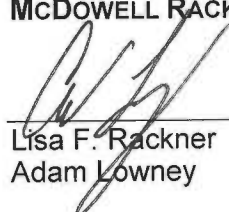
1 Board of Oregon, the Northwest Industrial Gas Users, and Northwest Energy Coalition  
2 requesting that the Commission open a docket to evaluate the sharing mechanisms for the  
3 Company's interstate storage and optimization revenues. It is expected that certain  
4 documents related to these revenues will contain confidential material. Public disclosure of  
5 the confidential information could be detrimental to NW Natural and its customers.

6 3. It is substantially likely that Commission Staff and others in this proceeding will  
7 seek to discover confidential business information. "The Commission's standard blanket  
8 protective order is designed to facilitate discovery in cases involving discovery of large  
9 numbers of documents." *See In re Portland Extended Area Service Region*, Docket UM 261,  
10 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of  
11 relevant information and expedite the discovery process.

12 For the foregoing reasons, NW Natural requests entry of the Commission's General  
13 Protective Order in this docket.

14  
15 DATED: June 6, 2013.

**MCDOWELL RACKNER & GIBSON PC**

  
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17 Lisa F. Rackner  
Adam Lowney

**NORTHWEST NATURAL GAS COMPANY**

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20 Mark Thompson  
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26 Attorneys for NW Natural

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in UM 1654 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.

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

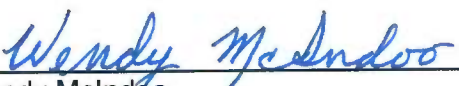
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Dated: June 6, 2013

  
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