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VIA ELECTRONIC FILING

PUC Filing Center Public Utility Commission of Oregon PO Box 1088 Salem, OR 97308-2148

Docket No. UM 1722 –Investigation into Recovery of Safety Costs by Natural Gas Re: Utilities

Dear PUC Filing Center:

Attached for filing in the above referenced case is an electronic copy of the Motion for Protective Order.

If you have any questions, please do not hesitate to contact this office.

Very truly yours,

Wendy Mcandov Wendy McIndoo

Attachments

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UM 1722			
3 4 5	IN THE MATTER OF PUBLIC UTILITY COMMISSION OF OREGON,	MOTION FOR PROTECTIVE ORDER		
6	Investigation into Recovery of Safety Costs by Natural Gas Utilities	.ex		
7 8 9 10 11 12	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. Good cause exists to issue a Protective Order to protect commercially sensitive and confidential business information related to the Public Utility Commission of Oregon Investigation into Recovery of Safety Costs by Natural Gas Utilities. 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. <i>See OAR</i> 860-001- 0080; ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other confidential research, development, or commercial information"). <i>See also In re</i> <i>Investigation into the Cost of Providing Telecommunication Service</i> , Docket UM 351, Order			
13 14 15				
16 17 18 19 20				
21 22 23 24	 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. On March 25, 2015, the Public Utility Commission of Oregon opened an investigation into the recovery of safety costs by Natural Gas Utilities upon the 			

25 recommendation of Staff. NW Natural anticipates that discovery in this proceeding will include 26

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

8 For the foregoing reasons, NW Natural requests entry of a standard Protective Order 9 in this docket.

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12			have the
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