

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.

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Very truly yours,

Lisa Rackner

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON		
2	UM 1804		
3	IN THE MATTER OF	MOTION FOR PROTECTIVE ORDER	
5 6	NORTHWEST NATURAL GAS COMPANY		
7 8	Application for Approval of Corporate Reorganization to Create a Holding Company.		
9		v	
10 11 12 13 14 15 16	Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Northwest Natural Gas Companional W 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 potective Order to protect commercially sensitive and confidential business information atted to the NW Natural's Application for Approval of Corporate Reorganization to Create and Company.  In support of this Motion, the Company states:		
18		rize NW Natural to seek reasonable restrictions on	
19 20	0080; ORCP 36(C)(7) (providing protection	dential business information. See OAR 860-001-against unrestricted discovery of "trade secrets or or commercial information"). See also In re	
21	Investigation into the Cost of Providing Telecommunication Service, Docket UM 351, Order		
22	No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect "the		
23	rights of a party to trade secrets and ot	her confidential commercial information" and "to	
24 25	facilitate the communication of information b	petween litigants").	

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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 McDowell Rackner & Gibson PC	
13	WICDOWELL RACKNER OF GIBSON PC	
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15	Lisa F. Rackner Attorneys for Northwest Natural Gas Company	
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17	Northwest Natural Gas Company Zachary Kravitz	
18	Associate Counsel 220 NW Second Ave	
19	Portland, OR 97209	
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## 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.

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Dated: February 10, 2017

Wendy McIndov
Wendy McIndov
Office Manager