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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 362: 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,

Alisha Till
Administrative Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UP 362

In the Matter of

NW NATURAL GAS COMPANY,

Application for Authorization of the Sale of
Salmon Valley Water Company to NW
Natural Water Company, LLC.

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 Authorization of the Sale 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”).

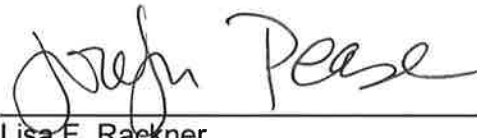
16 2. On January 17, 2018, NW Natural filed an Application for Authorization of the Sale
17 of Salmon Valley Water Company to NW Natural Water Company, LLC. NW Natural anticipates

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

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

DATED: January 19, 2018

MCDOWELL RACKNER GIBSON PC



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