

# McDowell Rackner & Gibson PC



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January 19, 2016

## VIA ELECTRONIC FILING

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

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

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

Wendy McIndoo

Attachments



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

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

10 January 19, 2016

**McDOWELL RACKNER & GIBSON PC**

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