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June 27, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High St SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

Re: LC ____; In the Matter of Northwest Natural Gas Company's 2018 Integrated Resource Plan

Please find enclosed the Northwest Natural Gas Company's, dba NW Natural ("Company"), motion for protective order. The Company intends to file an Integrated Resource Plan ("IRP") on or about August 24, 2018. Prior to filing, the Company intends to provide confidential information to interested parties. Accordingly, the Company requests the Commission grant the enclosed motion for protective order. Because a docket number has not yet been assigned to this matter, NW Natural also requests that the Commission establish a docket number to govern this proceeding.

The Company requests that discovery in this matter be managed through the Commission's Huddle website.

As indicated on the attached service list, a copy of this filing is being served to all parties participating in the Company's current general rate case, UG 344.

Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural Rates & Regulatory Affairs
220 NW Second Avenue
Portland, Oregon 97209
Telecopier: (503) 721-2516
Telephone: (503) 226-4211, ext. 3589
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Sincerely,

/s/ Zachary D. Kravitz

Zachary D. Kravitz
Associate Counsel
Northwest Natural Gas Company

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC _____

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba, NW NATURAL

2018 Integrated Resource Plan

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Northwest Natural Gas
2 Company (“NW Natural” or “Company”) moves for the entry of the Public Utility
3 Commission of Oregon’s (“Commission”) general protective order in this proceeding.
4 The Company intends to file its 2018 Integrated Resource Plan (“IRP”) on or about
5 August 24, 2018. Prior to filing the IRP, the Company is facilitating IRP workshops
6 and intends to provide confidential information to stakeholders through discovery.
7 Good cause exists to issue a Protective Order to protect commercially sensitive and
8 confidential business information related to NW Natural’s 2018 IRP.

9 In support of this Motion, the Company states:

10 1. The Commission’s rules authorize NW Natural to seek reasonable
11 restrictions on discovery of trade secrets and other confidential business information.
12 See OAR 860-001-0080; ORCP 36(C)(7) (providing protection against unrestricted
13 discovery of “trade secrets or other confidential research, development, or
14 commercial information”). See also *In re Investigation into the Cost of Providing*
15 *Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing

1 that protective orders are a reasonable means to protect “the rights of a party to
2 trade secrets and other confidential commercial information” and “to facilitate the
3 communication of information between litigants”).

4 2. NW Natural expects to receive discovery requests in this proceeding,
5 including requests for proprietary cost data and models, commercially sensitive
6 pricing information, and confidential market analyses and business projections. This
7 confidential business information is of significant commercial value, which could
8 expose the Company to competitive injury if disclosure is unrestricted. Issuance of a
9 protective order will facilitate the production of relevant information and expedite the
10 discovery process.

11 For the foregoing reasons, NW Natural requests entry of a standard
12 Protective Order in this proceeding.

13 Respectfully submitted this 27th day of June, 2018.

14 **NW NATURAL**

15 /s/ Zachary D. Kravitz

16 Zachary D. Kravitz,

17 OSB# 152870

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CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2018, I have served by electronic mail the foregoing Motion for Protective Order for NW Natural's 2018 Integrated Resource Plan upon all parties of record in docket UG 344, which is the Company's current general rate case.

UG 344

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DATED June 27, 2018, Portland, OR

/s/ Erica Lee-Pella
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