



JOCELYN PEASE  
Direct (503) 290-3620  
jocelyn@mrg-law.com

December 19, 2018

ALJ Patrick Power  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97308-1088

Dear Judge Power:

After reviewing the prehearing conference memorandum issued on December 17, 2018 ("PHC Memorandum"), NW Natural Water of Oregon, LLC ("Oregon Water") noted three relatively minor references in the memorandum that we believe may require clarification. Through this letter, Oregon Water respectfully requests clarification of the following issues:

- First, in Paragraph 5 of the PHC Memorandum, Oregon Water is instead referred to as NW Natural. Oregon Water requests that the memorandum be revised to reflect that Oregon Water is the party that had stated its intention to file a motion for modified protective order, and that Oregon Water is directed to file its motion by December 19, 2018.
- Second, the PHC Memorandum describes Oregon Water's intent to file a modified protective order "to limit disclosure of the terms of the purchase agreement between itself and SROA." Oregon Water seeks clarification that the purchase agreement is between Oregon Water and the owners of Sunriver Water, LLC, and Oregon Water is seeking to limit disclosure of the terms of the purchase agreement to potential competitors, including but not limited to the Sunriver Owners Association ("SROA").
- Third, the PHC Memorandum states that "[p]ending a ruling on its motion [for modified protective order], I suspend SROA's access to the unredacted version of the purchase agreement on Huddle." At this time, there is no unredacted version of the purchase agreement on Huddle; instead, Staff has served confidential data requests referencing portions of the purchase agreement, which have been shared with parties that have signed the general protective order, Order No. 18-410, in the confidential files on the Huddle site for this case. At the prehearing conference, Oregon Water had requested that pending a ruling on the modified protective order, that SROA's access to the confidential files on Huddle be suspended.

Oregon Water has conferred with the other parties in this proceeding, Staff, the Oregon Citizens' Utility Board, Sunriver Water, LLC, and the SROA, and these parties agree with Oregon Water's interpretation regarding the three issues described above and support Oregon Water's request for clarification.

Sincerely yours,

A handwritten signature in blue ink that reads "Jocelyn Pease". The signature is written in a cursive, flowing style.

Jocelyn Pease