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October 23, 2018

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

**Re: Docket No. UP ___: NW Natural Water of Oregon, LLC and Sunriver Water, LLC's
Motion for Protective Order.**

Attention Filing Center:

Attached for filing is an electronic copy of NW Natural Water of Oregon, LLC and Sunriver Water, LLC's Motion for a Protective Order. Please contact this office with any questions.

Sincerely,

Alisha Till
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UP _____

In the Matter of the Joint Application for an Order Approving the Sale of Sunriver Water, LLC to NW Natural Water of Oregon, LLC pursuant to ORS 757.480 and OAR 860-036-2120.

MOTION FOR PROTECTIVE ORDER

Expedited Consideration Requested

1 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, NW Natural Water of Oregon,
2 LLC (“Oregon Water”) and Sunriver Water, LLC (“SRW”) (collectively, “Parties”) move for the
3 entry of the Public Utility Commission of Oregon’s (“Commission”) general protective order
4 in this proceeding. Good cause exists to issue a Protective Order to protect commercially
5 sensitive and confidential business information related to the Parties’ Joint Application for an
6 Order Approving the Sale of Sunriver Water, LLC (“Joint Application”).

7 In support of this Motion, the Parties state:

8 1. The Commission’s rules authorize the Parties to seek reasonable restrictions
9 on discovery of trade secrets and other confidential business information. See 860-001-
10 0080; ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade secrets
11 or other confidential research, development, or commercial information”); see also *In re*
12 *Investigation into the Cost of Providing Telecommunication Service*, Docket UM 351, Order
13 No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect “the
14 rights of a party to trade secrets and other confidential commercial information” and “to
15 facilitate the communication of information between litigants”).

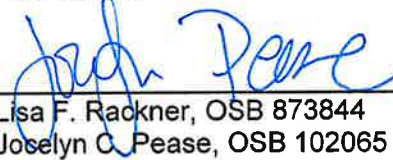
16 2. On October 23, 2018, the Parties filed a Joint Application for an Order Approving
17 the Sale of Sunriver Water, LLC to Oregon Water (“Joint Application”). The Joint Application
18 and supporting exhibits contain confidential information, which was filed under seal in

1 accordance with OAR 860-001-0070. The Parties anticipate that discovery in this proceeding
2 will include requests for proprietary business and financial information. The Parties will be
3 exposed to competitive injury if they are forced to make unrestricted disclosure of their
4 confidential business information. "The Commission's standard blanket protective order is
5 designed to facilitate discovery in cases involving discovery of large numbers of documents."
6 See *In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-958 (1991).
7 Issuance of a protective order will facilitate the production of relevant information and
8 expedite the discovery process.

9 For the foregoing reasons, the Parties request entry of a general protective order in
10 this docket.

Respectfully submitted this 23rd day of October, 2018.

McDOWELL RACKNER GIBSON PC



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