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December 17, 2019

VIA ELECTRONIC FILING

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

**Re: UG 388: Application of NW Natural for a General Rate Revision
Motion for General Protective Order – Expedited Consideration Requested**

Attached for filing in docket UG 388 is Northwest Natural Gas Company's, dba NW Natural ("NW Natural" or "Company"), motion for a general protective order. Please address correspondence on this matter to me with copies to the following:

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NW Natural
Rates and Regulatory Affairs
220 NW Second Avenue
Portland, Oregon 97209
Telephone: (503) 226-4211, ext. 3589
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Please call me if you have questions.

Sincerely,

NW NATURAL

/s/ Eric W. Nelsen

Eric W. Nelsen (OSB# 192566)
Senior Regulatory Attorney

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 388

In the Matter of
NORTHWEST NATURAL GAS
COMPANY dba NW Natural,
Application for a General Rate Revision

**MOTION FOR GENERAL
PROTECTIVE ORDER**
Expedited Consideration Requested

1 Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-001-0080,
2 Northwest Natural Gas Company dba NW Natural (“NW Natural” or “Company”) moves
3 for entry of the Public Utility Commission of Oregon’s (“Commission”) general protective
4 order in this proceeding to protect commercially sensitive and confidential business
5 information related to the Company’s forthcoming general rate revision, which will be
6 filed in the near future.

7 In support of this Motion, the Company states:

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

