



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnaturalwater.com

VIA ELECTRONIC FILING

July 1, 2021

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

**Re: UW 186: Application of Sunriver Water LLC for a General Rate Revision
Motion for General Protective Order – Expedited Consideration Requested**

Attached for filing in docket UW 186 is Sunriver Water LLC's ("Sunriver Water" or the "Company"), motion for a general protective order. Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural
Rates and Regulatory Affairs
250 SW Taylor Street
Portland, Oregon 97204
Telephone: 503.610.7330
Email: eFiling@nwnatural.com

Eric Nelsen
Senior Regulatory Attorney
NW Natural
250 SW Taylor Street
Portland, Oregon 97204
Telephone: 503.610.7618
Email: eric.nelsen@nwnatural.com
OSB# 192566

Tim Smith
General Manager
Sunriver Water LLC
PO Box 3699
Sunriver, Oregon 97707
Telephone: 971.285.4025
Email: tsmith@sunriverutilities.com

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**

UW 186

In the Matter of
SUNRIVER WATER LLC,
Request for a General Rate Revision

MOTION FOR
GENERAL PROTECTIVE ORDER
Expedited Consideration Requested

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Sunriver Water LLC
2 (“Sunriver Water” or “Company”) moves the Public Utility Commission of Oregon
3 (“Commission”) for the entry of a general protective order in this proceeding. Good
4 cause exists to issue a protective order to protect commercially sensitive and
5 confidential business information related to the Company’s pending general rate
6 revision. Because the Company’s responses to certain Staff discovery requests
7 (“DRs”) are due on July 8, 2021, Sunriver Water requests that the general
8 protective order be entered on an expedited basis.

9 In support of this motion, the Company states:

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

1 2. On May 28, 2021, Sunriver Water filed its application for a general rate
2 case. Staff submitted its first set of DRs on June 24, 2021. Certain information in
3 response to Staff’s DRs in this docket include confidential material, including
4 confidential employee data. Specifically, Staff DR 32 requests the following:
5 “Please provide the redacted confidential information referenced in the Company’s
6 response to question 22 in the application, the wage/salary column.” Public
7 disclosure of the confidential information could be detrimental to Sunriver Water
8 and its customers.

9 3. “The Commission’s standard blanket protective order is designed to
10 facilitate discovery in cases involving discovery of large numbers of documents.”
11 See *In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-
12 958 (1991). Issuance of a protective order will facilitate the production of relevant
13 information and expedite the discovery process.

14 4. Sunriver Water requests consideration of this Motion to allow parties
15 that execute the protective order to obtain prompt access to the confidential
16 information that will be submitted in support of the Company’s request for a general
17 rate increase and to expedite discovery in this proceeding.

18 For the foregoing reasons, Sunriver Water requests entry of a general
19 protective order in this docket.

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1 Dated July 1, 2021.

2 **NW NATURAL**

3 /s/ Eric W. Nelsen

4 Eric W. Nelsen

5 OSB# 192566

6 Senior Regulatory Attorney

7 NW Natural

8 250 SW Taylor Street

9 Portland, Oregon 97204

10 Email: eric.nelsen@nwnatural.com

11 Telephone: 503.610.7618