



ALISHA TILL
Direct (503) 290-3628
alisha@mrg-law.com

November 19, 2021

VIA ELECTRONIC FILING

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

Re: Docket UM 2192 - Northwest Natural Gas Company's Application for Approval of Deferred Accounting for TSA Security Directive 2 Compliance Expenses.

Attention Filing Center:

Attached for filing in the above-referenced docket is Northwest Natural Gas Company's Motion for General Protective Order, expedited consideration requested.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2192

In the Matter of

NORTHWEST NATURAL GAS COMPANY,
dba, NW Natural

Application for Approval of Deferred Accounting
for TSA Security Directive 2 Compliance
Expenses.

**MOTION FOR GENERAL
PROTECTIVE ORDER**

Expedited Consideration Requested

1 Pursuant to ORCP 36(C)(1), OAR 860-001-0080 and OAR 860-001-0420, Northwest
2 Natural Gas Company (“NW Natural” or the “Company”) moves for the entry of the Public Utility
3 Commission of Oregon’s (“Commission”) general protective order in this proceeding. Good
4 cause exists to issue a Protective Order to protect commercially sensitive and confidential
5 business information related to the Company’s Application to Defer Costs Associated with TSA
6 Security Directive 2 (“Application”). Concurrent with this filing, the Company is also filing a
7 Motion for Modified Protective Order.¹

8 In support of this Motion, the Company states:

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

¹ The Motion for Modified Protective Order seeks to protect two categories of information: (1) the TSA-designated Sensitive Security Information contained within Security Directive 2 and the Company’s plans and actions to comply therewith and (2) the Company’s highly confidential plans and actions for complying with the publicly available portions of Security Directive 2.

1 party to trade secrets and other confidential commercial information” and “to facilitate the
2 communication of information between litigants”).

3 2. On September 2, 2021, NW Natural filed an application seeking authorization to
4 use deferred accounting, pursuant to ORS 757.259 and OAR 860-027-0300, for the 12-month
5 period beginning September 2, 2021, through September 1, 2022, for amounts spent by NW
6 Natural to comply with the Department of Homeland Security’s Transportation Security
7 Administration (“TSA”) Security Directive Pipeline-2021-02 (“Security Directive 2”). NW Natural
8 anticipates that discovery in this proceeding will include requests for proprietary business and
9 financial information. NW Natural will be exposed to competitive injury if it is forced to make
10 unrestricted disclosure of its confidential business information. “The Commission’s standard
11 blanket protective order is designed to facilitate discovery in cases involving discovery of large
12 numbers of documents.” *See In re Portland Extended Area Service Region*, Docket UM 261,
13 Order No. 91-958 (1991). Issuance of a protective order will facilitate the production of relevant
14 information and expedite the discovery process.

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1 For the foregoing reasons, NW Natural requests entry of a general protective order in
2 this docket.

Respectfully submitted this 19th day of November 2021.

By: **MCDOWELL RACKNER GIBSON PC**



Jocelyn Pease
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
Telephone: (503) 290-3620
Email: jocelyn@mrg-law.com

NORTHWEST NATURAL GAS COMPANY

Eric Nelsen
Senior Regulatory Attorney
250 SW Taylor Street
Portland, Oregon 97204
Phone: (503) 721-2476
Email: eric.nelsen@nwnatural.com

Attorneys for Northwest Natural Gas Company