



AVION WATER CO INC.

60813 Parrell Rd • Bend, OR 97702 •  
Ph: 541-382-5342 • fax: 541-382-5390 • Email: [avion@avionwater.com](mailto:avion@avionwater.com)

***VIA ELECTRONIC FILING***

June 30, 2022

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

**Re: UW 193: Application of Avion Water Company, Inc. for a General Rate Revision  
Motion for General Protective Order – Expedited Consideration Requested**

Attached for filing in docket UW 193 is Avion Water Company, Inc.’s (“Avion Water” or the “Company”), motion for a general protective order. Please address correspondence on this matter to me with copies to the following:

Jason J. Wick  
President  
60813 Parrell Road  
Bend, OR 97702  
[jason@avionwater.com](mailto:jason@avionwater.com)  
(541) 382-5342

Richard C. Bailey  
Secretary-Treasurer  
60813 Parrell Road  
Bend, OR 97702  
[rick@avionwater.com](mailto:rick@avionwater.com)  
(541) 382-5342

Eric W. Nelsen, OSB #192566  
Senior Regulatory Attorney  
NW Natural  
250 SW Taylor Street  
Portland OR 97204-3038  
[eric.nelsen@nwnatural.com](mailto:eric.nelsen@nwnatural.com)  
(503) 610-7618

Please call me if you have questions.

Sincerely,

REPRESENTING AVION WATER COMPANY, INC.

*/s/ Eric W. Nelsen*

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

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UW 193**

In the Matter of  
AVION WATER COMPANY, INC.,  
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, Avion Water Company,  
2 Inc. (“Avion 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 application contains redacted employee  
7 wage/salary information and because Staff expects soon to issue discovery  
8 requests (“DRs”) including with regards to such redacted information, Avion Water  
9 requests that the general protective order be entered on an expedited basis.

10 In support of this motion, the Company states:

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

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

3 2. On June 30, 2022, Avion Water filed its application for a general rate  
4 case. The Company’s responses to questions 6 and 22 (including Attachment No.  
5 2) of the Company’s Testimony contain redacted employee wage/salary  
6 information. Staff has indicated to the Company that Staff expects soon to issue  
7 DRs regarding such redacted information and potentially other commercially  
8 sensitive and confidential business information. Public disclosure of the  
9 confidential information could be detrimental to Avion Water and its customers.

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

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

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

21 ///

22 ///

23 ///

1     ///

2             Dated June 30, 2022.

3                                     **REPRESENTING AVION WATER COMPANY, INC.**

4                                     /s/ Eric W. Nelsen

5                                     Eric W. Nelsen

6                                     OSB# 192566

7                                     Senior Regulatory Attorney

8                                     NW Natural

9                                     250 SW Taylor Street

10                                    Portland, Oregon 97204

11                                    Email: [eric.nelsen@nwnatural.com](mailto:eric.nelsen@nwnatural.com)

12                                    Telephone: 503.610.7618