

February 27, 2023

VIA ELECTRONIC FILING

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

**Re: Renewable Natural Gas Adjustment Mechanism—Dakota City
Expedited Consideration Requested**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), files herewith a motion for a general protective order in the upcoming above-mentioned proceeding.

Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural
250 SW Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7330
eFiling@nwnatural.com

Respectfully submitted,

/s/ Ryan Sigurdson

Ryan Sigurdson
Regulatory Attorney (OSB# 201722)
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

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In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba NW Natural

Renewable Natural Gas Adjustment
Mechanism—Dakota City

**MOTION FOR GENERAL
PROTECTIVE ORDER**

**Expedited Consideration
Requested**

1 Pursuant to ORCP 36(C)(1), OAR 860-001-0080, and OAR 860-001-0420,
2 Northwest Natural Gas Company (“NW Natural” or the “Company”) moves for the
3 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 application for the Dakota City
6 RNG project under Schedule 198, Renewable Natural Gas Adjustment Mechanism
7 of its tariff. The Company respectfully requests that the Commission enter a general
8 protective order by February 28, 2023, which is when the Company will file its
9 Dakota City RNG application. NW Natural also intends to file a Motion for entry of a
10 Modified Protective Order in the coming days. The Company is actively working with
11 entities that have participated in prior dockets to develop a mutually acceptable
12 Modified Protective Order.

13 In support of this Motion, the Company states:

14 1. The Commission’s rules authorize NW Natural to seek reasonable
15 restrictions on discovery of trade secrets and other confidential business information.
16 See OAR 860-001-0080; ORCP 36(C)(1) (providing protection against unrestricted

1 discovery of “a trade secret or other confidential research, development, or
2 commercial information”); *see also In re Investigation into the Cost of Providing*
3 *Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) (recognizing
4 that protective orders are a reasonable means to protect “the rights of a party to
5 trade secrets and other confidential commercial information” and “to facilitate the
6 communication of information between litigants”).

7 2. NW Natural anticipates filing an application for approval for the Dakota City
8 RNG project under Schedule 198, Renewable Natural Gas Adjustment Mechanism
9 of its tariff on February 28, 2023.

10 3. NW Natural’s application will include “Protected Information.” This
11 information is commercially sensitive because it includes confidential information
12 about the commercial terms and operation of the Dakota City RNG project.
13 Additionally, NW Natural expects that other types of commercially sensitive
14 information may later be requested or required in discovery and subsequently filed
15 testimony.

16 For the foregoing reasons, NW Natural requests entry of a general protective
17 order in this docket on an expedited basis.

18 Respectfully submitted this 27th day of February 2023.

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NW NATURAL

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/s/ Ryan Sigurdson

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Ryan Sigurdson

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Regulatory Attorney (OSB# 201722)

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