



# Citizens' Utility Board of Oregon

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610 SW Broadway, Suite 400  
Portland, OR 97205  
(503) 227-1984 ▪ (503) 274-2956 ▪ [cub@oregoncub.org](mailto:cub@oregoncub.org) ▪ [www.oregoncub.org](http://www.oregoncub.org)

February 16, 2012

Oregon Public Utility Commission  
Filing Center  
PO Box 2148  
Salem, OR 97308-2148

**Re: UG 221 Letter to ALJ Hardie re proposed Modified Protective Order**

Dear ALJ Hardie:

I am writing on behalf of the Citizens' Utility Board of Oregon (CUB), the Northwest Industrial Gas Users (NWIGU) and Staff (the parties), in regard to the Modified Protective Order (MPO) filed by Northwest Natural (NWN) on February 14, 2012.

As noted in NWN's Motion, the Company shared its original draft MPO with the parties. The parties have been working cooperatively to improve upon the Company's original draft MPO. We are pleased to report that while the Company's final filed proposed MPO does not resolve all of the issues raised by the parties, the filed proposed MPO does go a long way in that direction and is sufficient for the purposes of this docket.

The parties do, however, reserve the right to seek further redress, in this and future dockets, of the remaining issues, including but not limited to those noted below, should such become issues therein:

1. The need for a sworn statement by counsel for designating party that the Confidential and Highly Confidential designations were made on as few documents as possible.
2. The need for a definition of "impracticable" as used in paragraph 14.
3. The unnecessary limitation on counsel's disclosure, even to qualified clients under the protective order, contained in paragraph 22.

Sincerely,

G. Catriona McCracken  
General Counsel/Regulatory Program Director  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97205  
503-227-1984 Ext. 16  
[Catriona@oregoncub.org](mailto:Catriona@oregoncub.org)

c. Paula Pyron, NWIGU  
Jason Jones, Counsel for Staff

## UG 221 – CERTIFICATE OF SERVICE

I hereby certify that, on this 16<sup>th</sup> day of February, 2012, I served the foregoing **Letter to ALJ re Modified Protective Order** in docket UG 221 upon each party listed in the UG 221 Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

**W MCDOWELL RACKNER & GIBSON PC**  
LISA F RACKNER  
419 SW 11TH AVE., SUITE 400  
PORTLAND OR 97205  
[lisa@mcd-law.com](mailto:lisa@mcd-law.com)

**W NORTHWEST NATURAL**  
MARK R THOMPSON  
220 NW 2ND AVE  
PORTLAND OR 97209  
[mark.thompson@nwnatural.com](mailto:mark.thompson@nwnatural.com)

**W NW NATURAL**  
REGULATORY AFFAIRS E-FILING  
220 NW SECOND AVENUE  
PORTLAND OR 97209-2516  
[efiling@nwnatural.com](mailto:efiling@nwnatural.com)

**W PUBLIC UTILITY COMMISSION**  
**C JUDY JOHNSON**  
PO BOX 2148  
SALEM OR 97308-2148  
[judy.johnson@state.or.us](mailto:judy.johnson@state.or.us)

**W PUC STAFF--DOJ**  
**C JASON W JONES**  
1162 COURT ST NE  
SALEM OR 97301-4096  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us)

**W CABLE HUSTON BENEDICT HAAGENSEN & LLOYD**  
TOMMY A BROOKS  
1001 SW FIFTH AVE, STE 2000  
PORTLAND OR 97204-1136  
[tbrooks@cablehuston.com](mailto:tbrooks@cablehuston.com)

**W COMMUNITY ACTION PARTNERSHIP OF OREGON**  
JESS KINCAID  
PO BOX 7964  
SALEM OR 97301  
[jess@caporegon.org](mailto:jess@caporegon.org)

**W CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP**  
CHAD M STOKES  
1001 SW 5TH - STE 2000  
PORTLAND OR 97204-1136  
[cstokes@cablehuston.com](mailto:cstokes@cablehuston.com)

**W NORTHWEST INDUSTRIAL GAS USERS**  
PAULA E PYRON  
4113 WOLF BERRY CT  
LAKE OSWEGO OR 97035-1827  
[ppyron@nwigu.org](mailto:ppyron@nwigu.org)

**W NW ENERGY COALITION**  
WENDY GERLITZ  
1205 SE FLAVEL  
PORTLAND OR 97202  
[wendy@nwenergy.org](mailto:wendy@nwenergy.org)

**W NORTHWEST PIPELINE GP**  
JANE HARRISON  
295 CHIPETA WAY  
SALT LAKE CITY UT 84108  
[jane.f.harrison@williams.com](mailto:jane.f.harrison@williams.com)

**W PORTLAND GENERAL  
ELECTRIC**  
RANDY DAHLGREN  
121 SW SALMON ST - 1WTC0702  
PORTLAND OR 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

**W NORTHWEST PIPELINE GP**  
STEWART MERRICK  
295 CHIPETA WAY  
SALT LAKE CITY UT 84108  
[stewart.merrick@williams.com](mailto:stewart.merrick@williams.com)

**W PORTLAND GENERAL  
ELECTRIC**  
DOUGLAS C TINGEY  
121 SW SALMON 1WTC13  
PORTLAND OR 97204  
[doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)



G. Catriona McCracken  
OSB #933587  
General Counsel, Regulatory Program Director  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 400  
Portland OR 97205  
(503) 227-1984 ph  
(503) 274-2956 fax  
[Catriona@oregoncub.org](mailto:Catriona@oregoncub.org)