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October 13, 2022

***VIA ELECTRONIC FILING***

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

**Re: LC 79 – NW Natural’s 2022 Integrated Resource Plan – Motion for a General Protective Order**

Northwest Natural Gas Company, dba NW Natural, encloses for filing a motion for a general protective order in the above-mentioned proceeding.

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

eFiling  
Rates & Regulatory Affairs  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
Phone: (503) 610-7330  
Fax: (503) 220-2579  
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If you have any questions, please contact me.

Sincerely,

*/s/ Eric W. Nelsen*

Eric W. Nelsen  
Senior Regulatory Attorney  
Northwest Natural Gas Company

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 79**

In the Matter of  
  
NORTHWEST NATURAL GAS  
COMPANY dba NW Natural,  
  
2022 Integrated Resource Plan

**MOTION FOR GENERAL  
PROTECTIVE ORDER**  
  
**Expedited Consideration  
Requested**

1           Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-001-  
2 0080, Northwest Natural Gas Company, dba NW Natural (“NW Natural” or  
3 “Company”), moves for entry of the Public Utility Commission of Oregon’s  
4 (“Commission”) general protective order in this proceeding to protect commercially  
5 sensitive and confidential business information related to its Integrated Resource  
6 Plan (“IRP”) in docket LC 79.

7           In support of this Motion, the Company states:

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

1           2.       NW Natural plans to disclose the workpapers that were used to  
2 develop the IRP. These workpapers include proprietary cost data and models,  
3 commercially sensitive pricing information, and confidential market analyses and  
4 business projections, which could expose the Company to competitive injury if  
5 disclosure is unrestricted. In addition, the Company expects to receive discovery  
6 requests in this proceeding, including requests for confidential information that could  
7 also expose the Company to competitive injury without a general protective order.  
8 Issuance of such an order will facilitate the production of relevant information and  
9 expedite the discovery process.

10           For the foregoing reasons, NW Natural requests entry of a standard  
11 protective order in this proceeding on an expedited basis so that it can promptly  
12 disclose its IRP workpapers, as well as promptly respond to any data requests that  
13 require the disclosure of confidential information.

14           Respectfully submitted this 13<sup>th</sup> day of October 2022.

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**NW NATURAL**

/s/ Eric W. Nelsen  
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