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December 17, 2019

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: UG 388: Application of NW Natural for a General Rate Revision

Motion for General Protective Order – Expedited Consideration Requested

Attached for filing in docket UG 388 is Northwest Natural Gas Company's, dba NW Natural ("NW Natural" or "Company"), motion for a general protective order. Please address correspondence on this matter to me with copies to the following:

eFiling NW Natural Rates and Regulatory Affairs 220 NW Second Avenue Portland, Oregon 97209 Telephone: (503) 226-4211, ext. 3589

eFiling@nwnatural.com

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dockets@mrg-law.com OSB# 873844 Public Utility Commission of Oregon NWN's Motion for General Protective Order December 17, 2019; Page 2

Please call me if you have questions.

Sincerely,

NW NATURAL

/s/ Eric W. Nelsen

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

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UG 388

In the Matter of

NORTHWEST NATURAL GAS COMPANY dba NW Natural.

Application for a General Rate Revision

MOTION FOR GENERAL PROTECTIVE ORDER

Expedited Consideration Requested

Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-001-0080, 1 2 Northwest Natural Gas Company dba NW Natural ("NW Natural" or "Company") moves 3 for 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 general rate revision, which will be 6 filed in the near future. 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 commercial 12 information"). See also In re Investigation into the Cost of Providing Telecommunication 13 Service, Docket UM 351, Order No. 91-500 (1991) recognizing that protective orders

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between litigants."

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confidential commercial information" and "to facilitate the communication of information

are a reasonable means to protect "the rights of a party to trade secrets and other

1	2. NW Natural will soon file an application for a general rate revision. The
2	Company's filing will include confidential testimony and exhibits and, pursuant to OAR
3	860-022-0019(2)(a), responses to the Commission's Standard Data Requests, some of
4	which will contain confidential information. This information is confidential and
5	commercially sensitive, and constitutes "Protected Information," because it includes
6	proprietary cost data and models, commercially sensitive load projections, confidential
7	market analyses and business projections, confidential employee data, confidential
8	information regarding contracts for the purchase or sale of natural gas, and
9	commercially sensitive vendor contracts. Additionally, NW Natural expects that other
10	types of commercially sensitive information may later be requested or required in
11	discovery and/or subsequently filed testimony.
12	For the foregoing reasons, NW Natural requests entry of a standard protective
13	order in this proceeding on an expedited basis.
14	Respectfully submitted this 17th day of December, 2019.
15	NW NATURAL
16 17 18 19 20 21 22 23 24 25	/s/ Eric Nelsen Eric Nelsen OSB# 192566 Senior Regulatory Attorney Northwest Natural Gas Company 220 NW Second Ave. Portland, Oregon 97209 Email: eric.nelsen@nwnatural.com Phone: (503) 721-2476