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March 3, 2021

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: ADV 1215 / Advice No. 20-19 – Schedule 198 Renewable Natural Gas Recovery Mechanism - Motion for a General Protective Order Expedited Consideration Requested

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/ Ryan Sigurdson

Ryan Sigurdson
Regulatory Attorney
Northwest Natural Gas Company

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

ADV 1215/ADVICE NO. 20-19

In the Matter of

NORTHWEST NATURAL GAS
COMPANY dba NW Natural,

Schedule 198, Renewable Natural Gas
Recovery Mechanism

**MOTION FOR GENERAL
PROTECTIVE ORDER**

**Expedited Consideration
Requested**

1 Under Oregon Rule of Civil Procedure (ORCP) 36(C)(1) and OAR 860-
2 001-0080, 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
5 commercially sensitive and confidential business information related to its
6 proposal to add Schedule 198, Renewable Natural Gas (“RNG”) Recovery
7 Mechanism, to NW Natural’s tariff.

8 In support of this Motion, the Company states:

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

1 2. On March 1, 2021, Commission Staff requested that NW Natural
2 provide: 1) “the Excel revenue model, to include working formulas and cell
3 references, presented during the meeting with Staff and parties on February 19,
4 2021,” and 2) “a copy of the slide presentation shared with parties during the
5 February 19, 2021 meeting.” These materials were displayed on a screen during
6 an informal meeting with Commission Staff and other stakeholders, but were not
7 provided to them electronically or in hard copy. These materials contain
8 confidential and commercially sensitive “Protected Information” that describes the
9 RNG business activities of NW Natural, including information related to the
10 development of an RNG project in Lexington, Nebraska. Disclosure of this
11 information to RNG market participants would place NW Natural at a material
12 disadvantage relative to the rest of the market. Additionally, other types of
13 commercially sensitive information may later be requested or required in this
14 docket.

15 For the foregoing reasons, NW Natural requests entry of a standard
16 protective order in this proceeding on an expedited basis so that it can promptly
17 respond to Staff’s request.

18 Respectfully submitted this 3rd day of March, 2021.

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NW NATURAL

/s/ Ryan Sigurdson
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