



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

May 18, 2020

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: UM 2030 – Investigation Into the Use of Northwest Natural's Renewable Natural Gas Evaluation Methodology – 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
Telephone: (503) 610-7330
Fax: (503) 220-2579
eFiling@nwnatural.com

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**

UM 2030

In the Matter of

NORTHWEST NATURAL GAS COMPANY
dba NW Natural,

Investigation Into the Use of Northwest
Natural's Renewable Natural Gas
Evaluation Methodology

**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 the Company’s renewable
6 natural gas (“RNG”) project evaluation methodology as applied to an actual and
7 potential future RNG projects.

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 information.
11 See OAR 860-001-0080; ORCP 36(C)(1) (providing protection against unrestricted
12 discovery of “a trade secret or other confidential research, development, or
13 commercial information”). See also *In re Investigation into the Cost of Providing*
14 *Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) recognizing
15 that protective orders are a reasonable means to protect “the rights of a party to

1 trade secrets and other confidential commercial information” and “to facilitate the
2 communication of information between litigants.”

3 2. NW Natural will soon file information that applies the RNG project
4 evaluation methodology to an actual and potential RNG projects. This information is
5 confidential and commercially sensitive, and constitutes “Protected Information,”
6 because it shows how NW Natural evaluates an RNG project. Disclosure of this
7 information to RNG market participants would place NW Natural at a material
8 disadvantage relative to the rest of the market. Additionally, NW Natural expects
9 that other types of commercially sensitive information may later be requested or
10 required in this docket.

11 For the foregoing reasons, NW Natural requests entry of a standard
12 protective order in this proceeding on an expedited basis.

13 Respectfully submitted this 18th day of May, 2020.

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NW NATURAL

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/s/ Eric W. Nelsen

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Eric W. Nelsen

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OSB# 192566

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Senior Regulatory Attorney

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Northwest Natural Gas Company

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250 SW Taylor Street

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Portland, Oregon 97204

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Email: eric.nelsen@nwnatural.com

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Phone: (503) 610-7618

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