



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

April 7, 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: UM 2132 – NW Natural’s Deferral of Start-Up Costs Associated with Horizon 1 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
eFiling@nwnatural.com

If you have any questions, please contact me.

Sincerely,

/s/ Eric W. Nelsen

Eric W. Nelsen
OSB# 192566
Senior Regulatory Attorney
Northwest Natural Gas Company

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2132

In the Matter of

NORTHWEST NATURAL GAS
COMPANY dba NW Natural,

For Authorization to Defer Certain Start-
Up Costs Associated with Horizon 1
Pursuant to ORS 75.259

**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 NW Natural’s request for
6 authorization to defer for later ratemaking treatment operations and maintenance
7 start-up costs associated with developing and implementing the first phase of
8 Horizon.

9 In support of this Motion, the Company states:

10 1. The Commission’s rules authorize NW Natural to seek reasonable
11 restrictions on discovery of trade secrets and other confidential business information.
12 See OAR 860-001-0080; ORCP 36(C)(1) (providing protection against unrestricted
13 discovery of “a trade secret or other confidential research, development, or
14 commercial information”). See also *In re Investigation into the Cost of Providing*
15 *Telecommunication Service*, Docket UM 351, Order No. 91-500 (1991) recognizing
16 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. On April 6, 2021, NW Natural held a virtual meeting with, and made a
4 presentation to, the parties about the Company’s filing in this case. The parties
5 requested a copy of the Company’s presentation. The Company’s presentation
6 addresses non-public business negotiations and other commercially sensitive
7 aspects of the Company’s Horizon 1 project. Disclosure of the presentation to the
8 public would place NW Natural at a material disadvantage relative to counterparties
9 to those negotiations and the rest of the market. Additionally, other types of
10 commercially sensitive information may later be requested or 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 7th day of April, 2021.

14

NW NATURAL

15

/s/ Eric W. Nelsen

16

Eric W. Nelsen

17

OSB# 192566

18

Senior Regulatory Attorney

19

Northwest Natural Gas Company

20

250 SW Taylor Street

21

Portland, Oregon 97204

22

Email: eric.nelsen@nwnatural.com

23

Phone: (503) 610-7618