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January 20, 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 2145 – Application to Defer Cost of Service Associated with Tyson RNG Project – 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/ Ryan Sigurdson

Ryan Sigurdson
Regulatory Attorney
Northwest Natural Gas Company

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2145

In the Matter of

NORTHWEST NATURAL GAS
COMPANY dba NW Natural,

Application to Defer Cost of Service
Associated with Tyson RNG
Project

**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 the
6 Company’s Lexington, Nebraska renewable natural gas (“RNG”) project.

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

1 2. On January 15, 2021, Commission Staff requested “all contracts
2 and agreements executed by NWN related to the Tyson Fresh Meats renewable
3 natural gas project in Lexington, Nebraska.” These contracts contain confidential
4 and commercially sensitive “Protected Information” that describes the business
5 relationships and other pertinent terms and conditions of the project. Disclosure
6 of this information to RNG market participants would place NW Natural at a
7 material disadvantage relative to the rest of the market. Additionally, other types
8 of commercially sensitive information may later be requested or required in this
9 docket.

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 respond to Staff’s request.

13 Respectfully submitted this 20th day of January, 2021.

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NW NATURAL

/s/ Ryan Sigurdson
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