



**Salmon Valley**  
WATER™

**VIA ELECTRONIC FILING**

March 1, 2023

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

**Re: UW 195 - Application of Salmon Valley Water Company for a General Rate Revision  
Motion for General Protective Order (Expedited Consideration Requested)**

Attached for filing in docket UW 195 is Salmon Valley Water Company's motion for a general protective order. Please address correspondence on this matter to me with copies to the following:

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Salmon Valley Water Company  
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Please call me if you have questions.

Sincerely,

REPRESENTING SALMON VALLEY WATER COMPANY

*/s/ Eric W. Nelsen*

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Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UW 195**

In the Matter of  
SALMON VALLEY WATER COMPANY  
Request for a General Rate Revision

MOTION FOR  
GENERAL PROTECTIVE ORDER  
Expedited Consideration Requested

1 Pursuant to ORCP 36(C)(1) and OAR 860-001-0080, Salmon Valley Water  
2 Company (“Salmon Valley” or “Company”) moves the Public Utility Commission of  
3 Oregon (“Commission”) for the entry of a general protective order in this  
4 proceeding. Good cause exists to issue a protective order to protect commercially  
5 sensitive and confidential business information related to the Company’s pending  
6 general rate revision. Because the Company’s application contains redacted  
7 employee wage/salary information and because Staff expects soon to issue  
8 discovery requests (“DRs”), including with regard to such redacted information,  
9 Salmon Valley requests that the general protective order be entered on an  
10 expedited basis.

11 In support of this motion, the Company states:

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

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

3 2. On February 27, 2023, Salmon Valley filed its application for a general  
4 rate case. The Company’s response to question 22 of the Company’s Testimony  
5 contains redacted employee wage/salary information. Staff has indicated to the  
6 Company that Staff expects soon to issue DRs regarding such redacted information  
7 and potentially other commercially sensitive and confidential business information.  
8 Public disclosure of the confidential information could be detrimental to Salmon  
9 Valley and its customers.

10 3. “The Commission’s standard blanket protective order is designed to  
11 facilitate discovery in cases involving discovery of large numbers of documents.”  
12 See *In re Portland Extended Area Service Region*, Docket UM 261, Order No. 91-  
13 958 (1991). Issuance of a protective order will facilitate the production of relevant  
14 information and expedite the discovery process.

15 4. Salmon Valley requests consideration of this Motion to allow parties  
16 that execute the protective order to obtain prompt access to the confidential  
17 information that will be submitted in support of the Company’s request for a general  
18 rate increase and to expedite discovery in this proceeding.

19 For the foregoing reasons, Salmon Valley requests entry of a general  
20 protective order in this docket.

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1 Dated March 1, 2023.

2 **REPRESENTING SALMON VALLEY WATER COMPANY**

3 /s/ Eric W. Nelsen

4 Eric W. Nelsen

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6 Senior Regulatory Attorney

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