# McDowell Rackner & Gibson PC

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LISA RACKNER Direct (503) 595-3925 lisa@mcd-law.com

July 8, 2011

#### Via Email and Overnight Delivery

David Danner Executive Director and Secretary Washington Utilities and Transportation Commission PO Box 47250 1300 S Evergreen Park Drive SW Olympia WA 98504-7250

Re: In the matter of NW Natural Gas Company's Revision to Schedule P Docket No. UG – 111233

Dear Mr. Danner:

Enclosed on behalf of Northwest Natural Gas Company in the above proceeding are an original and twelve (12) copies of Northwest Natural Gas Company's Motion for Protective Order.

Please do not hesitate to call if you have any questions or concerns. Thank you for your assistance.

Very truly yours,

Lisa Rackner

Enclosures

## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

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### NORTHWEST NATURAL GAS COMPANY, dba NW Natural,

Revision to Schedule P to include acknowledging the recovery of the cost of gas acquired through Gas Reserves.

#### DOCKET UG-111233

## MOTION FOR PROTECTIVE ORDER

(Expedited Treatment Requested)

Pursuant to WAC 480-07-375, Northwest Natural Gas Company ("NW Natural" or "Company"), hereby moves for the entry of the Washington Utilities and Transportation Commission's ("Commission") standard protective order in conjunction with the Company's filing dated July 6, 2011. The Company's representatives for purposes of the proceeding are:

Mark Thompson NW Natural Manager, Rates and Regulatory 220 NW Second Ave. Portland, OR 97209 telephone: 503-721-2476 email: mark.thompson@nwnatural.com Rates and Regulatory Affairs NW Natural 220 NW Second Ave. Portland, OR 97209 email: efiling@nwnatural.com

Lisa Rackner McDowell Rackner & Gibson PC 419 SW 11<sup>th</sup> Avenue, Suite 400 Portland, OR 97205 telephone: 503-595-3925 email: lisa@mcd-law.com The Company respectfully requests, through this motion, that the Commission issue its standard protective order.

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On July 6, 2011, the Company filed revised tariff schedules, along with prefiled direct testimony and exhibits in support of the proposed tariff revisions. The filing seeks approval of the Company's proposed ratemaking treatment for its acquisition of natural gas reserves through a joint venture with Encana Oil & Gas (USA) Inc. ("Encana"). The Company requests that the Commission approve the tariff sheets in NWN Advice No. 11-4, with an express finding that the Company's decision to enter into the transaction is a prudent one. The Company marked a number of exhibits and as "confidential pursuant to WAC 480-07-160." These exhibits include sensitive information relating to the transaction with Encana. This information is commercially sensitive and its public release or its use outside of this proceeding could harm the Company and its customers.

Additionally, parties to this proceeding may request other types of information not listed above that is commercially valuable to the Company that should be protected from public disclosure or to persons who might make use of such information to the Company's detriment outside the scope of this proceeding.

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The Company respectfully requests that the Commission expeditiously enter its standard protective order before the prehearing conference so that the Company may be able to provide the confidential exhibits to all parties. The entry

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of the Commission's standard protective order will also facilitate the prompt commencement of discovery in this case.

#### II. CONCLUSION

Wherefore, the Company respectfully requests that the Commission enter on an expedited basis the standard protective order for this proceeding.

DATED: July 8, 2011.

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Respectfully Submitted, OU

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Attorneys for NW NATURAL

NW NATURAL

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