

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UG-18_____

ZACHARY KRAVITZ

REPRESENTING NORTHWEST NATURAL GAS COMPANY

CLAIM OF CONFIDENTIALITY

1 I, Zachary Kravitz, am the Director of Rates and Regulatory Affairs for Northwest
2 Natural Gas Company (“NW Natural” or “Company”). I make this claim of confidentiality
3 pursuant to WAC 480-07-160(5)(a) because NW Natural, through its supporting testimony,
4 exhibits and workpapers provided in the above captioned docket, is disclosing certain
5 information that is confidential and constitutes “valuable commercial information” as defined
6 by WAC 480-07-160(2) and protected under WAC 480-07-160 and RCW 80.04.095.

7 Any printed information NW Natural provides will, as required under WAC 480-07-
8 160, be marked as SHADED INFORMATION IS DESIGNATED AS CONFIDENTIAL PER
9 WAC 480-07-160, be submitted on yellow paper, and will be provided under separate cover.
10 The electronic information NW Natural provides will be reproduced separately on a compact
11 disk (CD) or thumb drive and will also be marked as SHADED INFORMATION IS
12 DESIGNATED AS CONFIDENTIAL PER WAC 480-07-160.

13 The confidential information that NW Natural is disclosing in its rate case filing can be
14 classified as confidential and proprietary employee data and salary information and
15 confidential information regarding environmental remediation expenses, proprietary trade
16 publications, non-public financial information, and a confidential corporate organizational
17 structure. As such, this information comprises valuable commercial information. The
18 information regarding environmental remediation expenses will become public after the
19 Company files its annual Form 10-K report with the Securities and Exchange Commission, at
20 which time the Company will remove the confidential designation.

21 I am of the opinion, therefore, that this information is “CONFIDENTIAL,” as defined
22 by WAC 480-07-160, and should be protected from public inspection, examination and
23 copying.

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RESPECTFULLY SUBMITTED this 24th day of December, 2018.

A handwritten signature in black ink, appearing to read 'ZKravitz', is written over a solid horizontal line.

Zachary Kravitz
Director of Rates and Regulatory Affairs
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