NW Natural®

250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

March 9, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97308-1088

RE: AR 641 – Division 001 Rule Updates—NW Natural Comments

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), appreciates the opportunity to comment on the Division 001 Rules, specifically OARs 860-001-0070, 0170, 0500, 0540, and 860-022-0019.

860-001-0070 – Confidential Information

In Order 20-088, the Public Utility Commission of Oregon ("Commission") temporarily waived the requirements in subsection (c) to file physical copies of confidential information. While NW Natural recognizes the efficiency of submitting confidential information electronically, especially during a period when many Commission employees and stakeholders are working from home, we urge caution before making this waiver a permanent requirement. Specifically, in the event that the Commission intends to make electronic filing a permanent requirement, NW Natural recommends that parties to this proceeding discuss what security measures will be taken to protect electronic information.

We would also recommend that parties to Commission proceedings continue to file physical copies of highly confidential information.

860-001-0500 – Discovery in Contested Case Proceedings

NW Natural is not recommending changes to this section.

860-001-0540 – Data Requests

NW Natural believes that Huddle, the designated shared workspace for data requests, is an efficient platform to manage the discovery process at the Commission. As noted above, NW Natural recommends that the parties to this proceeding discuss the security measures employed to protect electronically submitted confidential information, which may also necessitate reviewing and modifying Paragraph 16 of the General Protective

Order to determine what “reasonable precautions” constitute when handling electronic information.

860-022-0019(2)(a) – General Rate Revisions (Standard Data Requests)

The current rule states that the general rate revision filing must contain the standard data requests (SDR). To the extent it is unclear, this rule could be clarified that public utilities submit SDRs through the designated shared workspace.

860-001-0170 (f), (g) – Filing Requirements in Contested Case and Declaratory Ruling Proceedings (confidential information)

NW Natural is not recommending changes to subsections (f) and (g).

NW Natural looks forward to working with the Commission and other stakeholders in updating the Division 001 Rules. If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Zachary Kravitz

Zachary Kravitz
NW Natural
Director, Rates and Regulatory Affairs
250 SW Taylor Street
Portland, OR 97204
503-610-7617
zachary.kravitz@nwnatural.com