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VIA ELECTRONIC FILING

November 30, 2020

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

**Re: UW 184: 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 184 is Salmon Valley Water Company's ("Salmon Valley" or the "Company"), motion for a general protective order. Please address correspondence on this matter to me with copies to the following:

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Please call me if you have questions.

Sincerely,

NW NATURAL

/s/ Eric W. Nelsen

Eric W. Nelsen (OSB# 192566)
Senior Regulatory Attorney

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UW 184

In the Matter of

SALMON VALLEY WATER COMPANY

Application for a General Rate Revision

MOTION FOR
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 proceeding.
4 Good cause exists to issue a protective order to protect commercially sensitive and
5 confidential business information related to the Company’s pending general rate
6 revision. Because the Company’s responses to certain Staff discovery requests are
7 due on December 7, 2020, Salmon Valley requests that the general protective order
8 be entered on an expedited basis.

9 In support of this motion, the Company states:

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

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

3 2. On September 30, 2020, Salmon Valley filed its application for a general
4 rate case. Certain documents in response to Staff’s discovery requests in this docket
5 include confidential material, including confidential employee data. Public disclosure
6 of the confidential information could be detrimental to Salmon Valley and its
7 customers.

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

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

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

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1 Dated November 30, 2020.

2 **NW NATURAL**

3 /s/ Eric W. Nelsen

4 Eric W. Nelsen

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6 Senior Regulatory Attorney

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