

June 1, 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’s Comments and Proposed Revision

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), appreciates the opportunity to provide comments on the Public Utility Commission of Oregon’s (Commission) Division 001 Procedural Rules. The Company’s comments propose a clarification to OAR 860-001-0480(5) that the Company believes reflects existing practice.

NW Natural proposes adding a sentence to OAR 860-001-0480(5), which is bolded below:

“When filing testimony and exhibits, the filing party must simultaneously provide a copy of all work papers to Staff, the utility named in the initiating pleading, and all other parties that have asked to receive a copy. **Parties’ ability to access and use any protected information or highly protected information contained in work papers is subject to the requirements of the applicable protective order issued under OAR 860-001-0080.** If a shared workspace is being used for data requests and responses, this provision is satisfied by uploading the work papers to that workspace and electing to share the upload with other authorized users. As used in this rule, work papers consist of documents that show the source, calculations, and details supporting the testimony and other exhibits submitted.”

This addition reflects the existing practice of only providing unredacted versions of work papers to parties that have signed the appropriate protective order, and is meant to ensure that this section of the rules cannot be interpreted to somehow supersede a protective order issued under OAR 860-001-0080.

NW Natural looks forward to continue 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/ Ryan Sigurdson

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