

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

Docket No. UG-190210

CASCADE NATURAL GAS  
CORPORATION'S MOTION FOR  
STANDARD PROTECTIVE ORDER  
(**Expedited Treatment Requested**)

**I. RELIEF REQUESTED**

*1* In conjunction with the general rate case filed by Cascade Natural Gas Company (“Cascade” or “Company”) on March 29, 2019, Cascade moves for the entry of the standard protective order by the Washington Utilities and Transportation Commission (“Commission”) under WAC 480-07-420(1). Cascade seeks expedited treatment of this motion to ensure that its confidential information is covered by a standard protective order as promptly as possible.

Cascade’s representatives in this proceeding are:

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**II. BACKGROUND AND AUTHORITIES IN SUPPORT**

*2* On March 29, 2019, Cascade filed revised tariff schedules to increase base rates for its Washington customers, along with pre-filed direct testimony and exhibits in support of the proposed tariff revisions. Cascade marked information contained on certain pages of these testimonies and exhibits as confidential. Under WAC 480-07-510(3), the Company provided

workpapers in support of its filing, some portions of which are also marked confidential. Pending entry of the Commission’s standard protective order, the Company designated this information as confidential under the Commission’s general rule on confidentiality, WAC 480-07-160.

3           The information that Cascade marked “confidential” in its initial filing includes commercially sensitive information regarding confidential and proprietary cost data and models, commercially sensitive load projections, confidential market analyses and business projections, confidential employee data, confidential information regarding contracts for the purchase or sale of natural gas, and commercially sensitive vendor contracts. In discovery, parties to this proceeding may request other types of information that is commercially valuable to the Company or involves confidential information of customers, employees, business counter-parties or other third-parties. Cascade has minimized the amount of information it designated as confidential to promote the ability of the public to review the filing and participate in this case.

4           The Commission has authority to grant Cascade’s motion under WAC 480-07-420(1), which allows the Commission to enter “a standard form of protective order designed to promote the free exchange of information and development of the factual record in a proceeding when the commission finds that parties reasonably anticipate that discovery or evidentiary filings will require information designated as confidential as defined in WAC 480-07-160 to be disclosed to other parties in the adjudication.” In turn, WAC 480-07-160 defines confidential information as including, among other things, “[v]aluable commercial information, including trade secrets or confidential marketing, cost, or financial information,

or customer-specific usage and network configuration and design information, as provided in RCW 80.04.095 and 81.77.210.”

5           The material that Cascade seeks to protect in this case is the type of information that is intended to be eligible for confidential protection under RCW 80.04.095 and WAC 480-07-160. Public release of any of the confidential information could compromise the Company’s ability to compete fairly and impose a business risk to the Company. The result would be increased costs for Cascade and, ultimately, its customers.

### III. CONCLUSION

6           For the reasons set forth above, Cascade respectfully requests that the Commission enter its standard form of protective order in this case.

Respectfully submitted this 29<sup>th</sup> day of March, 2019.

*/s/ Lisa F. Rackner*

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