

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent

DOCKET UG-21_____

CASCADE NATURAL GAS
CORPORATION'S MOTION FOR
STANDARD PROTECTIVE ORDER

I. RELIEF REQUESTED

- 1.* In conjunction with the general rate case filing submitted by Cascade Natural Gas Corporation (“Cascade” or “Company”) on September 30, 2021, Cascade hereby moves for the entry of the standard form of protective order by the Washington Utilities and Transportation Commission (“Commission”) pursuant to WAC 480-07-375 and WAC 480-07-420(1).

II. STATEMENT OF FACTS

- 2.* On September 30, 2021, Cascade filed revised tariff schedules to increase base rates for its Washington customers, along with prefiled direct testimony and exhibits in support of the proposed tariff revisions. Pending the Commission’s consideration of this

motion, the Company designated portions of the information in its rate case filing as confidential pursuant to WAC 480-07-160(5)(c)(i). Pursuant to WAC 480-07-510(3), the Company also provided workpapers in support of its filing, portions of which were also marked confidential as described above.

3. The information that Cascade marked “confidential” in its initial filing includes commercially sensitive information regarding confidential and proprietary employee data and salary information, proprietary trade publications, and non-public financial information. Further, in discovery, parties to this proceeding are likely to request other information that is commercially valuable to the Company or involves confidential financial information regarding 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 actively participate in this case.

III. AUTHORITY AND ARGUMENT

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, “valuable 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 or 81.77.210.”

5. The material and information 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.

IV. 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 30th day of September, 2021.

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