

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION

Respondent.

Docket No. UE-15 \_\_\_\_\_

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 Corporation (Cascade or Company), on December 1, 2015, 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:

Lisa Rackner  
McDowell, Rackner & Gibson PC  
419 S.W. Eleventh Avenue, Suite 400  
Portland, OR 97205  
Telephone: (503) 595-3925  
Email: lisa@mcd-law.com

Michael Parvinen  
Director Regulatory Affairs  
Cascade Natural Gas Corporation  
8113 W. Grandridge Blvd.  
Kennewick, WA 99336-7166  
Email: michael.parvinen@cngc.com

**II. BACKGROUND AND AUTHORITIES IN SUPPORT**

2           On December 1, 2015, 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, and under RCW 80.04.095.

3           The information that Cascade marked "confidential" includes commercially sensitive information regarding 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 to promote the free exchange of information when parties reasonably anticipate that discovery in a proceeding will call for the production of confidential information." Under WAC 480-07-0423(3)(a), a protective order "is intended to protect information that might compromise a company's ability to compete fairly or that otherwise might impose a business risk if disseminated" publicly.

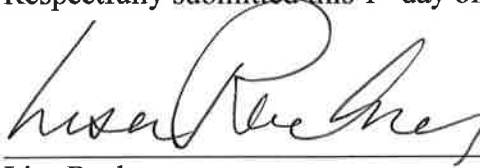
5           The material Cascade seeks to protect in this case is the type of information that is intended to be eligible for confidential protections under WAC 480-07-423(3)(a). Public release of any of the confidential information could compromise the Company's ability to

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 1<sup>st</sup> day of December, 2015.



---

Lisa Rackner  
McDowell, Rackner & Gibson PC  
419 S.W. Eleventh Avenue, Suite 400  
Portland, OR 97205  
Telephone: (503) 595-3925  
Email: [lisa@mcd-law.com](mailto:lisa@mcd-law.com)

Attorneys for Cascade Natural Gas Corporation