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August 29, 2018

VIA ELECTRONIC FILING

Mark L. Johnson Executive Director and Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW PO Box 47250 Olympia WA 98504-7250

Re: Docket No. UW-180630: In the Matter of the Application for the Sale and Transfer of Assets from Lehman Enterprises, Inc. to Cascadia Water, LLC.

Dear Mr. Johnson:

Lehman Enterprises, Inc. ("Lehman") submits this claim of confidentiality pursuant to WAC 480-07-160(4)(a) in connection with confidential information filed with the Washington Utilities and Transportation Commission on August 28, 2018, in the above-captioned proceeding. Lehman, through its Application for the Sale and Transfer of Assets from Lehman Enterprises, Inc., to Cascadia Water, LLC (a subsidiary of Northwest Natural Water, LLC, which, in turn, is a subsidiary of Northwest Natural Gas Company), disclosed certain information that is confidential and constitutes "valuable commercial information" as defined by WAC 480-07-160(2) and is protected under WAC 480-07-160 and RCW 80.04.095. The confidential information that Lehman disclosed includes the purchase price for the sale of specified assets of Lehman, and related terms and conditions of the sale, which is sensitive information due to the competitive market for water utility acquisitions, and as such, comprises valuable commercial information. Disclosure of the confidential information could negatively impact Lehman, and may result in harm to the purchaser, Cascadia Water, LLC. Accordingly, this information is confidential, as defined by WAC 480-07-160(2), and should be protected from public inspection, examination and copying.

Very truly yours,

Robert E. Brewster

Attorney for Lehman Enterprises, Inc.