

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

DOCKET UG-140381

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

**I. RELIEF REQUESTED**

1           In conjunction with the complaint case filed by the Washington Utilities and Transportation Commission (Commission) Staff on October 28, 2014, Cascade Natural Gas Corporation (Cascade, or Company) moves for the entry of the standard protective order by the 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.

**II. BACKGROUND AND AUTHORITIES IN SUPPORT**

2           On October 28, 2014, Staff filed a complaint against Cascade alleging violations of RCW 80.28.080 and WAC 480-90-178(1)(b), related to application of late payment charges, late payment charge tariff conditions, and rates and charges related to disconnect visits set forth in Company's tariff. On January 21, 2015, the Commission convened a prehearing conference and invoked the discovery rules, WAC 480-07-400. The parties have initiated discovery, and certain information requested by parties includes customer

information requiring confidential treatment. Pending entry of the Commission's standard protective order, the Company designated this information as confidential under the Commission's general rule on confidential information, WAC 480-07-160. Cascade has minimized the amount of information it designated as confidential to promote the ability of the parties to review the information provided in discovery and participate in this case.

3 Cascade anticipates that throughout the course of this proceeding, parties 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.

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), the confidential designation under 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. The Commission has previously entered protective orders in complaint cases. *See, e.g., Wash. Utils. & Transp. Comm'n v. Puget Sound Energy, Inc.*, Docket U-111465, Order 02 (Feb. 10, 2012).

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

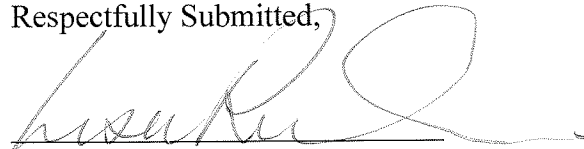
compete fairly and impose a business risk to the Company. The result would be increased costs for Cascade and its customers.

## II. CONCLUSION

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

DATED: February 11, 2015.

Respectfully Submitted,



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