

**EXHIBIT A (ATTORNEY AGREEMENT)**

AGREEMENT CONCERNING CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Ralph Cavanagh, as attorney in this proceeding for NRDC (party to this proceeding) agree to comply with and be bound by the Protective Order entered by the Washington Utilities and Transportation Commission in Docket UE-200115, and acknowledge that I have reviewed the Protective Order and fully understand its terms and conditions. I further agree to be responsible for any violations of the Protective Order that result from the conduct of administrative staff I allow to have access to Confidential Information.



\_\_\_\_\_  
Signature

04/13/2020  
Date

111 Sutter St., 21st Fl., San Francisco, CA 94104  
Address

**EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)**

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Ralph Cavanagh, as

In-house counsel

In-house expert

Outside counsel

Outside expert

in this proceeding for NRDC (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of electric resources;
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Exhibit C of the Protective Order; and
- c. If I am in-house or outside counsel, I further agree to be responsible for any violations of the Protective Order that result from the conduct of administrative staff I allow to have access to Highly Confidential Information.



Signature

04/13/2020

Date

San Francisco, CA

City/State where this Agreement was signed

NRDC

Employer

Co-Director, Energy Program

Position and Responsibilities

111 Sutter St., 21st Fl.,

San Francisco, CA 94104  
Permanent Address

\* \* \*

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

X  No objection.

         Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.



Signature

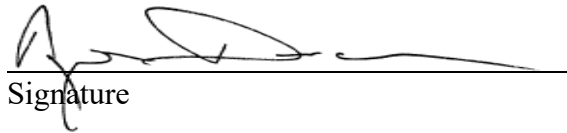
04/13/2020

Date

**EXHIBIT B (EXPERT AGREEMENT)**

AGREEMENT CONCERNING CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Angus Duncan, as expert witness in this proceeding for the  
Natural Resources Defense Council (NRDC) (a party to  
this proceeding) hereby agree to comply with and be bound by the Protective Order  
Entered by the Washington Utilities and Transportation Commission in Docket  
UE-200115 and acknowledge that I have reviewed the Protective Order and fully  
understand its terms and conditions.

  
\_\_\_\_\_  
Signature

04/16/2020  
\_\_\_\_\_  
Date

Self  
\_\_\_\_\_  
Employer

2373 NW Johnson St, Portland OR 97210  
\_\_\_\_\_  
Address

Consultant  
\_\_\_\_\_  
Position

\*\* \*

The following portion is to be completed by the responding party and filed with the  
Commission within 10 days of receipt; failure to do so will constitute a waiver and the  
above-named person will be deemed an expert having access to Confidential Information  
under the terms and conditions of the protective order.

\_\_\_\_\_ No objection.

\_\_\_\_\_ Objection. The responding party objects to the above-named expert having  
access to Confidential Information. The objecting party shall file a motion setting forth  
the basis for objection and asking exclusion of the expert from access to Confidential  
Information.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)**

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Angus Duncan, as

In-house counsel

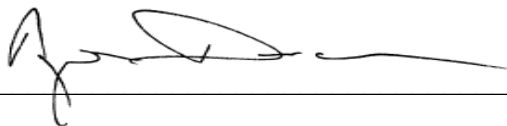
In-house expert

Outside counsel

Outside expert

in this proceeding for Natural Resources Defense Council (NRDC) (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of electric resources;
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Exhibit C of the Protective Order; and
- c. If I am in-house or outside counsel, I further agree to be responsible for any violations of the Protective Order that result from the conduct of administrative staff I allow to have access to Highly Confidential Information.



Signature

April 16, 2020

Date

ORDER 01

Portland, OR

City/State where this Agreement was signed

Self-employed/Consultant to NRDC

Employer

Advise NRDC on matters related to electric utilities in the Pacific Northwest, and on climate change mitigation

2373 NW Johnson Street, Portland, OR 97210

Position and Responsibilities

Permanent Address

\*\* \*

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

\_\_\_\_\_ No objection.

\_\_\_\_\_ Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.

\_\_\_\_\_  
Signature Date

**EXHIBIT B (EXPERT AGREEMENT)**

AGREEMENT CONCERNING CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Amanda Levin, as expert witness in this proceeding for Natural Resources Defense Council (NRDC) (a party to this proceeding) hereby agree to comply with and be bound by the Protective Order entered by the Washington Utilities and Transportation Commission in Docket UE-200115 and acknowledge that I have reviewed the Protective Order and fully understand its terms and conditions.



Signature

4/10/2020

Date

Natural Resources Defense Council

Employer

1152 15<sup>th</sup> St NW Suite 300, Washington, DC, 20005  
Address

Policy Analyst, Climate & Clean Energy  
Position and Responsibilities

\* \* \*

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt; failure to do so will constitute a waiver and the above-named person will be deemed an expert having access to Confidential Information under the terms and conditions of the protective order.

\_\_\_\_\_ No objection.

\_\_\_\_\_ Objection. The responding party objects to the above-named expert having access to Confidential Information. The objecting party shall file a motion setting forth the basis for objection and asking exclusion of the expert from access to Confidential Information.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)**

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Amanda Levin, as

In-house counsel

In-house expert

Outside counsel

Outside expert

in this proceeding for Natural Resources Defense Council (NRDC) (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of electric resources;
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Exhibit C of the Protective Order; and
- c. If I am in-house or outside counsel, I further agree to be responsible for any violations of the Protective Order that result from the conduct of administrative staff I allow to have access to Highly Confidential Information.



4/10/2020

Signature

Date



Washington, DC \_\_\_\_\_

City/State where this Agreement was signed

Natural Resources Defense Council (NRDC)  
\_\_\_\_\_

Employer

Policy Analyst, Climate & Clean Energy  
\_\_\_\_\_

1152 15<sup>th</sup> St NW, Suite 300, Washington DC 20005  
\_\_\_\_\_

Position and Responsibilities

Permanent Address

\* \* \*

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

\_\_\_\_\_ No objection.

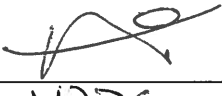
\_\_\_\_\_ Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.


\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**EXHIBIT A (ATTORNEY AGREEMENT)**

AGREEMENT CONCERNING CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I,  Noah Long, as attorney in  
this proceeding for NRDC (party to  
this proceeding) agree to comply with and be bound by the Protective Order entered by  
the Washington Utilities and Transportation Commission in Docket UE-200115, and  
acknowledge that I have reviewed the Protective Order and fully understand its terms and  
conditions. I further agree to be responsible for any violations of the Protective Order that  
result from the conduct of administrative staff I allow to have access to Confidential  
Information.

 4/13/20  
Signature Date  
44 Old Taos Highway, Santa Fe, NM 87501  
Address

**EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)**

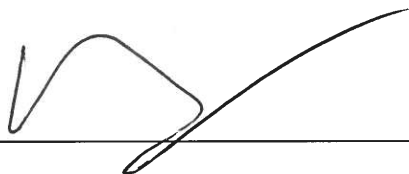
AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Noah Long, as

- In-house counsel
- In-house expert
- Outside counsel
- Outside expert

in this proceeding for NRDC (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of electric resources;
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Exhibit C of the Protective Order; and
- c. If I am in-house or outside counsel, I further agree to be responsible for any violations of the Protective Order that result from the conduct of administrative staff I allow to have access to Highly Confidential Information.

  
\_\_\_\_\_

Signature

4/13/20  
\_\_\_\_\_

Date

Santa Fe, NM

City/State where this Agreement was signed

NRDC

Employer

Western Director

Position and Responsibilities

414 Old Taos Highway  
Santa Fe, NM 87501

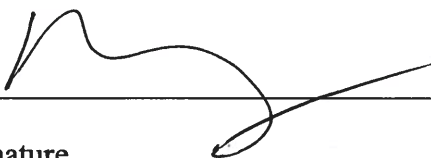
Permanent Address

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The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

No objection.

Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.

  
Signature

4/13/20  
Date

**EXHIBIT B (EXPERT AGREEMENT)**

AGREEMENT CONCERNING CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

<sup>a</sup> consultant <sup>n</sup> I, CHARLES MAGRAW, as expert  
~~witness in this proceeding~~ for NATURAL RESOURCES DEFENSE COUNCIL (a party to  
this proceeding) hereby agree to comply with and be bound by the Protective Order  
entered by the Washington Utilities and Transportation Commission in Docket  
UE-200115 and acknowledge that I have reviewed the Protective Order and fully  
understand its terms and conditions.

Ch. A. Magraw  
Signature

04/14/20  
Date

SELF  
Employer

501 8th Ave. Helena MT  
Address 59601

CONSULTANT  
Position and Responsibilities

\*\*\*

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt; failure to do so will constitute a waiver and the above-named person will be deemed an expert having access to Confidential Information under the terms and conditions of the protective order.

\_\_\_\_\_ No objection.

\_\_\_\_\_ Objection. The responding party objects to the above-named expert having access to Confidential Information. The objecting party shall file a motion setting forth the basis for objection and asking exclusion of the expert from access to Confidential Information.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)**

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, CHARLES MAGIZAW, as

In-house counsel

In-house expert

Outside counsel

Outside expert

in this proceeding for NATURAL RESOURCES COUNCIL <sup>DEFENSE</sup> (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of electric resources;
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Exhibit C of the Protective Order; and
- c. If I am in-house or outside counsel, I further agree to be responsible for any violations of the Protective Order that result from the conduct of administrative staff I allow to have access to Highly Confidential Information.

Charles Magizaw

Signature

04/14/20

Date

HELENA, MT

City/State where this Agreement was signed

SELF

Employer

CONSULTANT

Position and Responsibilities

501 8th Ave. Helena MT  
59601

Permanent Address

\* \* \*

The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

\_\_\_\_\_ No objection.

\_\_\_\_\_ Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**EXHIBIT A (ATTORNEY AGREEMENT)**

**AGREEMENT CONCERNING CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

I, Kate White Tudor, as attorney in  
this proceeding for NRDC (party to  
this proceeding) agree to comply with and be bound by the Protective Order entered by  
the Washington Utilities and Transportation Commission in Docket UE-200115, and  
acknowledge that I have reviewed the Protective Order and fully understand its terms and  
conditions. I further agree to be responsible for any violations of the Protective Order that  
result from the conduct of administrative staff I allow to have access to Confidential  
Information.

Kate White Tudor                      4/13/2020  
Signature                                      Date

2417 Capitol Way S. Olympia WA 98501  
Address



**EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)**

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION  
IN DOCKET UE-200115  
BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Kate White Tuley, as

In-house counsel

In-house expert

Outside counsel

Outside expert

in this proceeding for NRDC (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of electric resources;
- b. I have read and understand, and agree to be bound by, the terms of the Protective Order in this proceeding, including this Exhibit C of the Protective Order; and
- c. If I am in-house or outside counsel, I further agree to be responsible for any violations of the Protective Order that result from the conduct of administrative staff I allow to have access to Highly Confidential Information.

Kate White Tuley

Signature

4/13/2020

Date

Olympia, WA

City/State where this Agreement was signed

White Tudor LLC

Employer

Lobbyist/Advocate

Position and Responsibilities

2417 Capitol Way S Olympia  
WA 98501

Permanent Address

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The following portion is to be completed by the responding party and filed with the Commission within 10 days of receipt. Failure to do so will constitute a waiver and the above-named person will be deemed a person having access to Highly Confidential Information under the terms and conditions of the protective order.

\_\_\_\_\_ No objection.

\_\_\_\_\_ Objection. The responding party objects to the above-named person having access to Highly Confidential Information. The objecting party shall file a motion with the Commission, supported by affidavit, setting forth the basis for objection and asking exclusion of the person from access to Highly Confidential Information.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date