

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

The PUBLIC COUNSEL Section of the
Office of the Washington Attorney
General

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION; PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondents.

DOCKET NO U-030744

MOTION BY SPRINT FOR
PROTECTIVE ORDER

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1. United Telephone Company of the Northwest, d/b/a Sprint (“Sprint”) respectfully moves the Commission to enter a protective order in this docket, pursuant to Washington Administrative Code 480-09-015.

2. All correspondence regarding this Motion should be directed to the undersigned counsel for Sprint:

William E. Hendricks III
Sprint - Attorney
902 Wasco Street
Hood River, OR 97031
(541) 387-9439 phone
(541) 387-9753 fax
tre.e.hendricks.iii@mail.sprint.com


3. Public Counsel and intervenors Willman, et al., (collectively “Requesting Parties”) are seeking data from Sprint that is commercially sensitive and propriety. Specifically, the Requesting Parties seek information concerning the nature and location of Sprint’s facilities on the Yakama Reservation, the number of Sprint’s customers, and the level of Sprint’s revenues by class. Such information is commercially sensitive because Sprint’s competitors on the

Nation, including intervenor Charter Communications, would gain a competitive advantage if they obtained unrestricted access to this information.

4. In addition, providing such network information on an unrestricted basis could undermine the security of Sprint's facilities on the Yakama Reservation.

5. Therefore, Sprint requests that the Commission enter its standard protective order in this proceeding.

Respectfully submitted this 16th day of September, 2003.

By: 

William E. Hendricks III
WSBA No. 29786
902 Wasco Street
Hood River, OR 97031
(541) 387-9439

Attorney for Sprint