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March 30, 2018

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: Docket LC 69 – Cascade Natural Gas Corporation’s 2018 Integrated Resource Plan (“IRP”)

Attached for filing in the above-identified docket is Cascade Natural Gas Corporation’s Motion for Protective Order

Please contact me at (509) 734-4589 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Mark Sellers-Vaughn". The signature is written in a cursive style.

Mark Sellers-Vaughn
Manager, Supply Resource Planning
Cascade Natural Gas Corporation
8113 W Grandridge Blvd
Kennewick, WA 99336-7166
mark.sellers-vaughn@cngc.com

Enclosures

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON**

LC 69

In the Matter of

CASCADE NATURAL GAS CORPORATION

2018 Integrated Resource Plan

MOTION FOR PROTECTIVE ORDER

1 Pursuant to ORCP 36(C)(7) and OAR 860-001-0080, Cascade Natural Gas
2 Corporation (“Cascade” or “Company”) moves for the entry of the Public Utility
3 Commission of Oregon’s (Commission) general protective order in this proceeding.
4 Good cause exists to issue a Protective Order to protect commercially sensitive and
5 confidential business information related to the Company’s filed 2018 Integrated
6 Resource Plan.

7 1. The Commission’s rules authorize Cascade to seek reasonable restrictions
8 on discovery of trade secrets and other confidential business information. *See* OAR 860-
9 001-0080; ORCP 36(C)(7) (providing protection against unrestricted discovery of “trade
10 secrets or other confidential research, development, or commercial information’); *See*
11 *also In re Investigation into the Cost of Providing Telecommunication Service*, Docket
12 UM 351, Order No. 91-500 (1991) (recognizing that protective orders are a reasonable
13 means to protect “ the rights of a party to trade secrets and other confidential commercial
14 information” and “to facilitate the communication of information between litigants”).

1 2. On February 6, 2018, Cascade filed its 2018 Integrated Resource Plan. It
2 is expected that certain documents related to the filing will contain confidential material,
3 including but not limited to proprietary cost data and models, commercially sensitive load
4 and resource projections, confidential market analyses and business projections,
5 confidential information regarding contracts for the purchase or sale of natural gas, and
6 commercially sensitive vendor contracts. Public disclosure of the confidential
7 information could be detrimental to Cascade and its customers.

8 3. It is substantially likely that Staff and others in this proceeding will seek to
9 discover confidential business information. “The Commission’s standard blanket
10 protective order is designed to facilitate discovery in cases involving discovery of large
11 numbers of documents.” *See in re Portland Extended Area Service Region*, Docket UM
12 261. Order No. 91-958 (1991). Issuance of a protective order will facilitate the
13 production of relevant information and expedite the discovery process.

14 For the foregoing reasons, Cascade request entry of a standard Protective Order
15 in this docket.

16 DATED: March 30, 2018
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Mark Sellers-Vaughn
Manager
Supply Resource Planning
Cascade Natural Gas Corporation