

McDowell Rackner & Gibson PC



WENDY MCINDOO
Direct (503) 595-3922
wendy@mcd-law.com

March 30, 2015

VIA ELECTRONIC FILING

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

**Re: UG 287 - In the Matter of CASCADE NATURAL GAS CORPORATION, Request for
a General Rate Revision**

Attention Filing Center:

Attached for filing in the above-captioned docket is Cascade Natural Gas Corporation's Motion for Protective Order. Cascade requests expedited consideration of this Motion.

Please contact this office with any questions.

Very truly yours,

Wendy McIndoo
Office Manager

Enclosures

cc: Docket UG 224 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 287

In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

MOTION FOR PROTECTIVE ORDER
Expedited Consideration Requested

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 Commission of
3 Oregon's (Commission) standard protective order in this proceeding. The Company will file its
4 application for a general rate revision on March 31, 2015, and requests expedited
5 consideration of this Motion to allow parties that execute the protective order to obtain prompt
6 access to the confidential information that will be filed in support of the Company's request for
7 a rate revision and to expedite discovery in this proceeding. Good cause exists to issue a
8 standard protective order to protect commercially sensitive and confidential business
9 information related to the Company's request for a general rate increase. In support of this
10 Motion, the Company states:

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

1 2. On March 31, 2015, Cascade will file its general rate case to revise its schedules of
2 rates and charges for providing natural gas service in Oregon. Cascade anticipates that
3 certain documents related to the rate case filing will contain confidential material, including but
4 not limited to proprietary cost data and models, commercially sensitive load projections,
5 confidential market analyses and business projections, confidential employee data,
6 confidential information regarding contracts for the purchase or sale of natural gas, and
7 commercially sensitive vendor contracts. Public disclosure of the confidential information
8 could be detrimental to Cascade and its customers.

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

15 4. Cascade requests expedited consideration of this Motion to allow parties who
16 execute the protective order to obtain prompt access to the confidential exhibits and work
17 papers that will be submitted in support of the Company’s request for a general rate increase
18 and to expedite discovery in this proceeding. In addition, some of the Company’s responses
19 to the standard data requests submitted in accordance with OAR 860-022-0019 contain
20 confidential information.

21 For the foregoing reasons, Cascade requests expedited entry of the Commission’s
22 standard protective order in this docket.

DATED: March 30, 2015

MCDOWELL RACKNER & GIBSON PC

A handwritten signature in black ink, appearing to read "Joseph Pease", written in a cursive style.

Lisa F. Rackner
Jocelyn C. Pease

Attorneys for Cascade