



ALISHA TILL
Direct (503) 290-3628
alisha@mrg-law.com

March 16, 2020

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UG 390 – Cascade Natural Gas Corporation’s Application for a General Rate Revision.

Attention Filing Center:

Attached for filing in the above-captioned docket is a copy of Cascade Natural Gas Corporation’s Motion for Protective Order, expedited consideration requested.

Please contact this office with any questions.

Sincerely,

/s/ Alisha Till

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 390

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)(1) 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”) general protective order in this proceeding. Good cause exists to
4 issue a Protective Order to protect commercially sensitive and confidential business
5 information related to the Company’s forthcoming general rate case. Because the Company
6 will be filing in the near future, Cascade requests that the general protective order be entered
7 on an expedited basis.

8 In support of this Motion, the Company states:

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

17 2. Cascade will soon file its application for a general rate case. Cascade anticipates
18 that certain documents related to the filing will contain confidential material, including but not
19 limited to proprietary cost data and models, commercially sensitive load projections,

1 confidential market analyses and business projections, confidential employee data,
2 confidential information regarding contracts for the purchase or sale of natural gas, and
3 commercially sensitive vendor contracts. Public disclosure of the confidential information could
4 be detrimental to Cascade and its customers.

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

11 4. Cascade requests consideration of this Motion to allow parties who execute the
12 protective order to obtain prompt access to the confidential exhibit(s) and work papers that will
13 be submitted in support of the Company's request for a general rate increase and to expedite
14 discovery in this proceeding. In addition, some of the Company's responses to the standard
15 data requests to be submitted in accordance with OAR 860-022-0019 will contain confidential
16 information.

17 For the foregoing reasons, Cascade requests entry of a general protective order in this
18 docket.

DATED: March 16, 2020

McDOWELL RACKNER GIBSON PC



Lisa Rackner
Jocelyn Pease
419 SW 11th Avenue, Suite 400
Portland, OR 97205
Telephone: (503) 595-3925
Email: dockets@mrg-law.com

Attorneys for Cascade Natural Gas Corporation