



WENDY MCINDOO  
Direct (503) 290-3627  
Wendy@mrg-law.com

April 4, 2016

**VIA ELECTRONIC FILING**

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

**Re: UG 305 - In the Matter of CASCADE NATURAL GAS CORPORATION, Request for a  
General Rate Revision**

Attention Filing Center:

Attached for filing in Docket UG 305 is an electronic copy of Cascade Natural Gas Corporation's Motion for Protective Order. Please contact this office with any questions.

Very truly yours,

Wendy McIndoo  
Office Manager

Attachments

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 305

In the Matter of

CASCADE NATURAL GAS CORPORATION

Application for a General Rate Revision.

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 Commission of  
3 Oregon's (Commission) standard protective order in this proceeding. The Company will file its  
4 application for a general rate revision in the latter half of April 2016. Good cause exists to  
5 issue a standard protective order to protect commercially sensitive and confidential business  
6 information related to the Company's request for a general rate increase. In support of this  
7 Motion, the Company states:

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

16 2. In April 2016, Cascade will file its general rate case to revise its schedules of rates  
17 and charges for providing natural gas service in Oregon. Cascade anticipates that certain  
18 documents related to the rate case 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  
4 could be detrimental to Cascade and its customers.

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

DATED: April 4, 2016

**MCDOWELL RACKNER & GIBSON PC**



---

Lisa F. Rackner  
Jocelyn C. Pease

Attorneys for Cascade