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July 29, 2020

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

**Re: LC 76 Cascade Natural Gas Corporation's 2020 Integrated Resource Plan ("IRP")**

Attached for filing is Cascade Natural Gas Corporation's Motion for Protective Order for the 2020 Integrated Resource Plan that is scheduled to be filed on July 31, 2020.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Mark Sellers-Vaughn".

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  
LC 76 Protective Order

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON**

**LC 76**

In the Matter of

CASCADE NATURAL GAS CORPORATION

2020 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 soon-to-be filed 2020  
6           Integrated 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”).

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2. On July 31, 2020, Cascade will file its 2020 Integrated Resource Plan (LC 76). It is expected that certain documents related to the filing will contain confidential material, including but not limited to proprietary cost data and models, commercially sensitive load and resource projections, confidential market analyses and business projections, confidential information regarding contracts for the purchase or sale of natural gas, and commercially sensitive vendor contracts. Public disclosure of the confidential information could be detrimental to Cascade and its customers.

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

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

DATED: July 29, 2020



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Mark Sellers-Vaughn  
Manager  
Supply Resource Planning  
Cascade Natural Gas Corporation