



COLE ALBEE
Main (503) 595-3922
cole@mrg-law.com

January 25, 2024

VIA E-MAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket UM 2307 - In the Matter of Cascade Natural Gas Corporation, Renewable Natural Gas (RNG) Program Petition as required per Oregon Administrative Rule (OAR) 860-150-0400(1)

Attached for filing in the above-referenced docket, please find Cascade Natural Gas Corporation's Notice of Use of General Protective Order 23-132.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Cole Albee".

Cole Albee
Paralegal
McDowell Rackner Gibson PC

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 2307

In the Matter of

CASCADE NATURAL GAS CORPORATION,

Renewable Natural Gas (RNG) Program
Petition as required per Oregon Administrative
Rule (OAR) 860-150-0400(1).

**NOTICE OF USE OF GENERAL
PROTECTIVE ORDER**

Expedited Consideration Requested

1 Cascade Natural Gas Corporation (“Cascade”) hereby provides notice that it anticipates
2 designating information to be produced or used in this docket as protected under the
3 Commission’s General Protective Order No. 23-132 (“GPO”). Cascade previously filed a Motion
4 for Modified Protective Order on January 24, 2024 to protect highly confidential information.

5 Cascade Natural Gas Corporation has filed its Petition for Renewable Natural Gas
6 Program (“RNG”), which includes confidential information regarding the Company’s plans for
7 RNG acquisition. In addition, Cascade anticipates that Staff and intervenors will seek to
8 discover confidential business information in the discovery process. The Commission’s rules
9 authorize Cascade Natural Gas Corporation to seek reasonable restrictions on discovery of
10 trade secrets and other confidential business information. See OAR 860-001-0080 and
11 ORCP 36(C)(1) (providing protection against unrestricted discovery of “trade secret[s] or other
12 confidential research, development, or commercial information”). Issuance of a protective order
13 will facilitate the production of relevant information and expedite the discovery process. The
14 GPO is available at: <https://apps.puc.state.or.us/orders/2023ords/23-132.pdf>. Other parties to
15 the proceeding may seek access to the protected information under the terms of the GPO using
16 the signatory pages in Order No. 23-132.

17 The individuals listed in the table below are employees of Cascade Natural Gas
18 Corporation or Cascade’s counsel and are identified for purposes of accessing information
19 designated as protected by Cascade within the docket. Cascade will provide updates to this

- 1 table during the course of the proceeding to ensure that it accurately identifies the employees
- 2 who should have access.

PRINTED NAME	EMAIL	DATE
Michael Parvinen	Michael.Parvinen@cngc.com	January 25, 2024
Lori Blattner	lori.blattner@intgas.com	January 25, 2024
Jocelyn Pease	jocelyn@mrg-law.com	January 25, 2024
Cole Albee	cole@mrg-law.com	January 25, 2024
Lauren Richards	lauren@mrg-law.com	January 25, 2024

Respectfully submitted on January 25, 2024.

By: **MCDOWELL RACKNER GIBSON PC**



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