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Attorneys for Tract Capital Management, LP and NRG Energy

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Proposed Rulemaking Concerning Utah Code §§ 54-26-101 to -901, Large Scale Electric Service Requirements	Docket No. 25-R318-01
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NOTICE OF APPEARANCE

- A. Thorvald A. Nelson (CO #24715, MT #8666, NV #15442, WY #8-6796) enters his appearance for the Tract Capital Management LP (“Tract”) and NRG Energy (“NRG”).
- B. Pursuant to Rule R746-1-107 of the Rules of Practice and Procedure of the Utah Public Service Commission, Thorvald A. Nelson, hereby enters his appearance to represent the Tract Capital Management and NRG Energy in this proceeding with associated counsel, Chad Baker.
- C. Counsel representation pursuant to this notice would serve the interests of the parties and the efficient and just administration of the case. Tract and NRG intend to fully participate in this Rulemaking, which will be helpful for a thorough consideration of the relevant issues to help ensure fairness and clarity promulgating new Rules.

R746-1-107. Representation of Parties, states as follows:

- (1) A party may:
 - (a) be represented by:***
 - (i) an attorney licensed to practice in Utah; or
 - (ii) ***an attorney licensed in a foreign state, if the attorney provides the Commission with a certificate of good standing from the state where licensed;***
 - (b) represent oneself individually; or
 - (c) if not an individual, represent itself through an officer or ***employee.***
- (2) ***An attorney who appears pursuant to Subsection R746-1-107(1)(a)(ii) is not required to:***
 - (a) apply for pro hac vice admission to the Utah State Bar; or***
 - (b) partner with counsel licensed in Utah.***

(emphasis added). Counsel are partners at the Denver office of the law firm of Holland & Hart LLP. Associated counsel, Chad Baker, is also a partner at Holland & Hart in the Salt Lake City office. Thor Nelson is licensed in Colorado, Montana, Nevada, and Wyoming. His certificates of good standing from Colorado is attached as Exhibit A, a certificate of good standing from Montana is attached as Exhibit B, a certificate of good standing from Nevada is attached as Exhibit C, a certificate of good standing from Wyoming is attached as Exhibit D. Pursuant to this rule, application for pro hac vice status is not required, but admission is allowed based on the discretion of the Commission, subject to compliance as stated above.

- D. Counsel regularly collaborates with other regulatory counsel in Utah and other jurisdictions. The undersigned is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court.
- E. Having complied with the applicable statute and rules, Tract and NRG request permission to be represented by the undersigned Counsel to be admitted for this purpose as counsel of record in this proceeding.
- F. If approved, service upon Tract and NRG through the undersigned is requested as

follows:

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Respectfully submitted this 28th day of August, 2025.

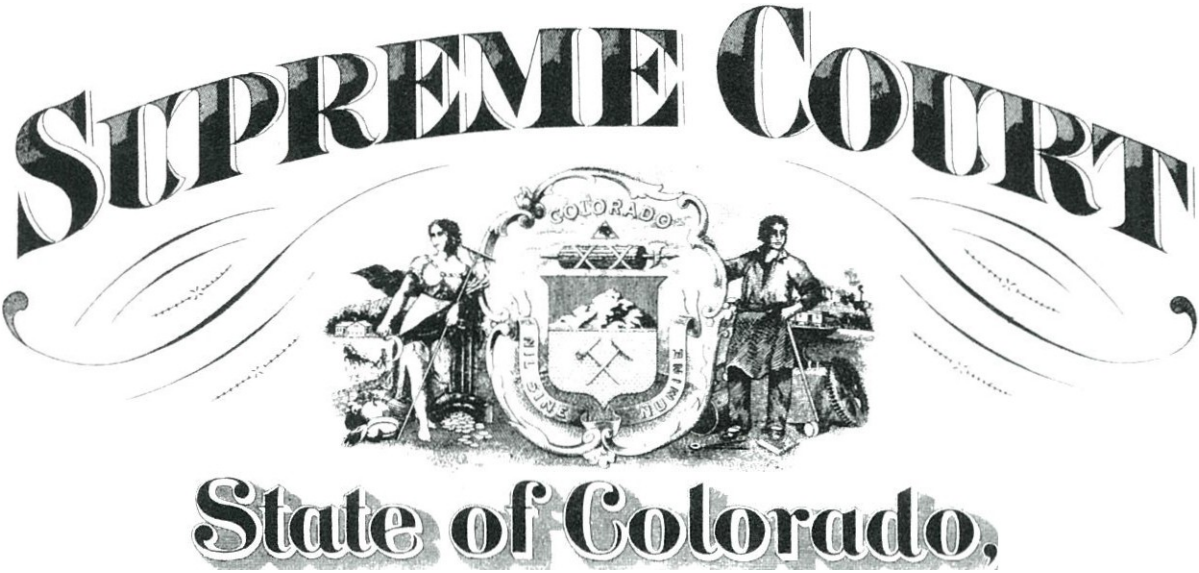
INTERWEST ENERGY ALLIANCE

s/ Chad Baker

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*Attorneys for Tract Capital Management, LP and
NRG Energy*

**Attachments: Exhibit A, Certificate of Good Standing, Colorado
Exhibit B, Certificate of Good Standing, Montana
Exhibit C, Certificate of Good Standing, Nevada
Exhibit D, Certificate of Good Standing, Wyoming**



STATE OF COLORADO, ss:

I, Cheryl Stevens, Clerk of the Supreme Court of the State of Colorado, do hereby certify that

THORVALD ANDREW NELSON

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys

and Counselors at Law in my office of date the 14th

day of October A.D. 1994 and that at the date

hereof the said THORVALD ANDREW NELSON is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

18th day of June A.D. 2025

Cheryl Stevens

Clerk

By

A handwritten signature in cursive script, appearing to read "Kristo Miller".

Deputy Clerk



CERTIFICATE of the CLERK of the SUPREME COURT of the STATE OF MONTANA

I, Bowen Greenwood, Clerk of the Supreme Court of the State of Montana, do hereby certify that THORVALD ANDREW NELSON residing in Denver, CO was on the 27th *day* of January, 007 duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his/her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

Witness my hand and seal of the court,

This 23rd day of June, 2025.

A handwritten signature in black ink, appearing to read "B. Greenwood", is written over a horizontal line.

Clerk of the Supreme Court

***CERTIFICATE OF THE CLERK OF THE SUPREME COURT
OF THE STATE OF NEVADA***

I, Elizabeth A. Brown, Clerk of the Supreme Court of the State of Nevada, do hereby certify that THORVALD NELSON (Bar No.15442) was on the 08TH day of MAY, 2020 duly admitted as an attorney and counselor at law to practice in all the courts of the State of Nevada; and that the Supreme Court of Nevada is the highest court in this state;

I FURTHER CERTIFY that the said that THORVALD NELSON in good standing; and that his name now appears on the Roll of Attorneys in this office.



IN TESTIMONY WHEREOF, I HAVE HEREUNTO SET MY HAND AND
AFFIXED THE OFFICIAL SEAL OF SAID SUPREME COURT, AT MY
OFFICE IN CARSON CITY, NEVADA, THIS 06TH DAY OF JUNE, 2025.

ELIZABETH A. BROWN, CLERK
SUPREME COURT
STATE OF NEVADA



Chief Deputy Clerk

**CERTIFICATE OF THE CLERK OF THE
SUPREME COURT
OF THE
STATE OF WYOMING**

I, Shawna Goetz, Clerk of the Supreme Court of the State of Wyoming, hereby certify that, according to the records of my office:

Thorvald Andrew Nelson

was, on the 1st day of April, 2022, duly admitted and licensed to practice as an attorney and counselor at law in all the courts of Wyoming; and is currently an active member of the Wyoming State Bar in good standing.

Given under my hand and the seal of said
Court this 17th day of June, 2025.

Shawna Goetz, Clerk


by deputy



CERTIFICATE OF SERVICE

I certify that on August 28, 2025, I caused a true and correct copy of the foregoing to be filed with the Public Service Commission via email to psc@utah.gov and served upon the following in Utah Docket No. 25-R318-01 as indicated below:

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