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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. Abigail C. Briggerman (CO #46028, MD #0612120095, WY #7-5476) enters her 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, Abigail C. Briggerman, hereby enters her 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 is a partner 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. Abigail C. Briggerman is licensed in Colorado, Maryland, and Wyoming. Her certificate of good standing from Colorado is attached as Exhibit A, a certificate of good standing from Maryland is attached as Exhibit B, and a certificate of good standing from Wyoming is attached as Exhibit C. 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 10th day of September, 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, Maryland
Exhibit C, Certificate of Good Standing, Wyoming**

CERTIFICATE OF SERVICE

I certify that on September 10, 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:

BY Electronic-Mail:

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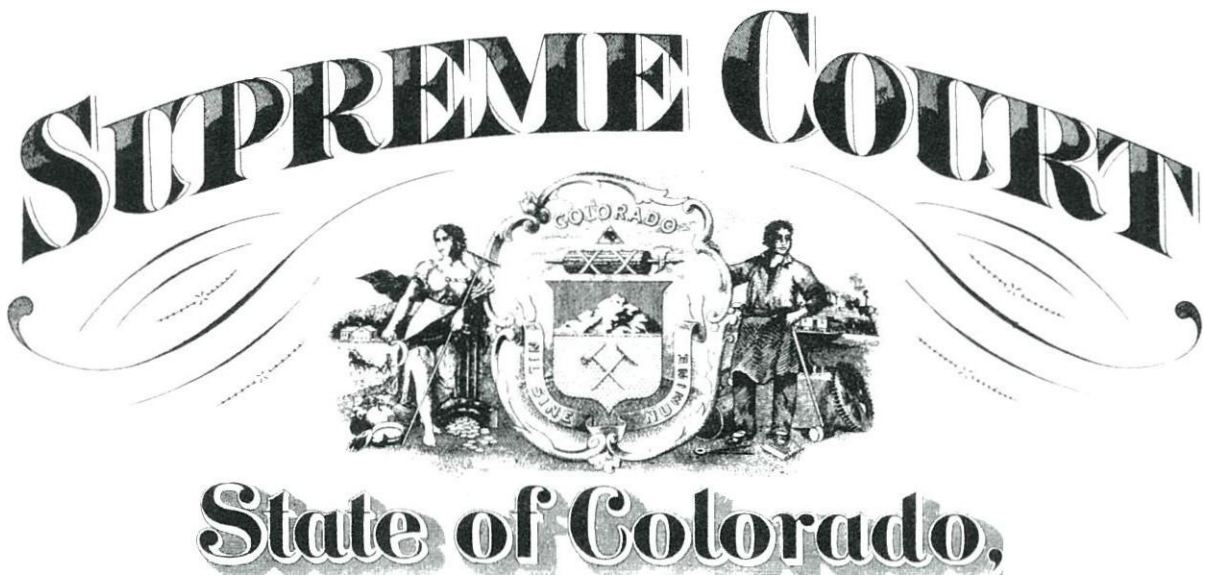
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STATE OF COLORADO, ss:

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

Abigail Briggerman

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 28th

day of August A.D. 2013 and that at the date

hereof the said Abigail Briggerman 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 3rd day of September A.D. 2025

Cheryl Stevens
Clerk

By Jennifer A Kendall
Deputy Clerk

Supreme Court of Maryland

Annapolis, MD



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

I, Gregory Hilton, Clerk of the Supreme Court of Maryland, do hereby certify that on the twelfth day of December, 2006,

Abigail Clark Briggerman

having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court. This certificate of good standing is valid through the eighth day of November, 2025.



In Testimony Whereof, I have hereunto set my hand as Clerk, and affixed the Seal of the Supreme Court of Maryland, this ninth day of September, 2025.

A handwritten signature in black ink, reading "Gregory Hilton".

Clerk of the Supreme Court of Maryland

**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:

Abigail Clark Briggerman

was, on the 2nd day of March, 2015, 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 29th day of August, 2025.

Shawna Goetz, Clerk


by deputy

