

Mary Anne Q. Wood (3539)  
Stephen Q. Wood (12403)  
WOOD BALMFORTH LLC  
60 E. South Temple, Suite 500  
Salt Lake City, UT 84111  
Telephone: (801) 366-6060  
Facsimile: (801) 366-6061  
E-mail: [mawood@woodbalmforth.com](mailto:mawood@woodbalmforth.com)  
[swood@woodbalmforth.com](mailto:swood@woodbalmforth.com)

*Attorneys for Ellis-Hall Consultants, LLC*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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IN THE MATTER OF THE APPLICATION OF  
ROCKY MOUNTAIN POWER FOR  
APPROVAL OF POWER PURCHASE  
AGREEMENT BETWEEN PACIFICORP AND  
BLUE MOUNTAIN POWER PARTNERS,  
LLC

Docket No. 13-035-115

***MOTION TO DISQUALIFY COUNSEL***

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**INTRODUCTION**

Pursuant to Utah R. Prof. Conduct 1.6 and 1.18, Ellis-Hall Consultants, LLC (“Ellis-Hall”) hereby moves to disqualify Mr. Dodge as counsel for Blue Mountain Power Partners (“Blue Mountain”) on the basis that Mr. Dodge formed an attorney-client relationship with Ellis-Hall, accepted Ellis-Hall’s confidential communications, disclosed Ellis-Hall’s confidential information, and is now taking a direct and adverse representation to Ellis-Hall’s interests.

The factual and legal basis supporting this motion is more fully set forth in the accompanying memorandum.

DATED this 26<sup>th</sup> day of August, 2013.

WOOD BALMFORTH LLC

/s/ Stephen Q. Wood

Mary Anne Q. Wood

Stephen Q. Wood

60 E. South Temple, Suite 500

Salt Lake City, UT 84111

Telephone: (801) 366-6060

Facsimile: (801) 366-6061

E-mail: [mawood@woodbalmforth.com](mailto:mawood@woodbalmforth.com)

[swood@woodbalmforth.com](mailto:swood@woodbalmforth.com)

*Attorneys for Ellis-Hall Consultants, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of August, 2013, a true and correct copy of the forgoing ***MOTION TO DISQUALIFY COUNSEL*** was served via e-mail to the following:

PacifiCorp:

Data Request Response Center      [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

Rocky Mountain Power:

Mark Moench                              [mark.moench@pacificorp.com](mailto:mark.moench@pacificorp.com)  
Yvonne Hogle                              [yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)  
Daniel. E. Solander                      [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)  
David L. Taylor                            [dave.taylor@pacificorp.com](mailto:dave.taylor@pacificorp.com)

Division of Public Utilities:

Patricia Schmid                           [pschmid@utah.gov](mailto:pschmid@utah.gov)  
Justin Jetter                               [jjetter@utah.gov](mailto:jjetter@utah.gov)  
Chris Parker                               [chrisparker@utah.gov](mailto:chrisparker@utah.gov)  
William Powell                            [wpowell@utah.gov](mailto:wpowell@utah.gov)

Office of Consumer Services:

Brain Farr                                   [bfarr@utah.gov](mailto:bfarr@utah.gov)  
Michele Beck                              [mbeck@utah.gov](mailto:mbeck@utah.gov)  
Cheryl Murray                            [cmurray@utah.gov](mailto:cmurray@utah.gov)

Blue Mountain Power Partners, LLC:

Gary A. Dodge                             [gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)  
Michael D. Cutbirth                      [mcutbirth@champlinwind.com](mailto:mcutbirth@champlinwind.com)

/s/ Stephen Q. Wood \_\_\_\_\_