

Gary A. Dodge (0897)
Phillip J. Russell (10445)
HATCH, JAMES & DODGE, P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Facsimile: (801) 363-6666
Email: gdodge@hjdllaw.com
prussell@hjdllaw.com

Counsel for Blynco, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE FORMAL COMPLAINT OF BLYNCO, INC. AGAINST ROCKY MOUNTAIN POWER	Docket No. 16-035-41
--	----------------------

NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Commission Order dated November 10, 2016 in this Docket, Gary A. Dodge and Phillip J. Russell of Hatch, James & Dodge, P.C. hereby enter an appearance as counsel for Blynco, Inc. (“Blynco”). Communications regarding this Docket should be addressed to Mr. Dodge and Mr. Russell at the email addresses and physical address listed above.

Pursuant to a stipulation between Blynco and Rocky Mountain Power, as well as to a request by the Division, the Commission’s November 10 Order stayed a previously-issued scheduling order pertaining to Rocky Mountain Power’s October 27, 2016 Motion to Dismiss. Blynco hereby requests a scheduling conference to allow the parties to discuss scheduling issues with the Commission. Among the issues to be discussed is whether Rocky Mountain Power’s Motion to Dismiss, which purports to be filed pursuant to Utah Rule of Civil Procedure 12(b)(6), should be converted to a Motion for Summary Judgment because it relies on facts not set forth in

Blyncsy's Complaint. Moreover, Blyncsy may need to conduct discovery on certain facts set forth in Rocky Mountain Power's Motion to Dismiss. Blyncsy requests that the Commission set a scheduling conference during the week of November 28, 2016 to discuss these issues.

DATED this 21st day of November, 2016.

Respectfully submitted

By: /s/ Gary A. Dodge

/s/ Phillip J. Russell

Gary A. Dodge

Phillip J. Russell

HATCH, JAMES AND DODGE, PC

Attorneys for Blyncsy, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 21st day of November 2016 on the following:

Public Service Commission: psc@utah.gov

Rocky Mountain Power:

Dan Solander daniel.solander@pacificorp.com
Bob Lively bob.lively@pacificorp.com
Megan McKay megan.mckay@pacificorp.com
Yvonne Hogle Yvonne.hogle@pacificorp.com

Division of Public Utilities:

Patricia Schmid pschmid@utah.gov
Justin Jetter jjetter@utah.gov
Chris Parker chrisparker@utah.gov
Erika Tedder etedder@utah.gov

Office of Consumer Services:

Rex Olsen rolsen@utah.gov
Robert Moore rmoore@utah.gov
Michele Beck mbeck@utah.gov

/s/ Lauren Mckan_____