

Yvonne R. Hogle Assistant General Counsel 1407 West North Temple, Suite 320 Salt Lake City, UT 84116 801.220.4050 801.220.3299 Fax

October 5, 2017

VIA ELECTRONIC FILING

Public Service Commission of Utah Heber M. Wells Building, 4th Floor 160 East 300 South Salt Lake City, UT 84114

- Attention: Gary Widerburg Commission Secretary
- **RE: Docket No. 17-035-26** In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Glen Canyon Solar A, LLC

Dear Mr. Widerburg:

Enclosed for filing in the above-referenced matter is Rocky Mountain Power's ("Company") Motion And Consent of Sponsoring Local Counsel For Pro Hac Vice Admission of Karen Kruse.

Please feel free to call me at the number referenced above or Bob Lively at (801) 231-5883 if you have any questions.

Sincerely,

Yvonne R. Hogle Assistant General Counsel

Enclosures

R. Jeff Richards (7294) Yvonne R. Hogle (7550) PacifiCorp d/b/a Rocky Mountain Power 1407 West North Temple, Suite 320 Salt Lake City, UT 84116 Telephone: 801-220-4050 Facsimile: 801-220-3299 E-mail: <u>Robert.Richards@pacificorp.com</u> E-mail: <u>Yvonne.Hogle@pacificorp.com</u>

Sarah K. Link Karen J. Kruse PacifiCorp d/b/a Pacific Power 825 NE Multnomah St., Suite 2000 Portland, Oregon 97232 Telephone: 503-813-5865 E-mail: <u>Sarah.Link@pacificorp.com</u> E-mail: <u>Karen.Kruse@pacificorp.com</u>

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Glen Canyon Solar A, LLC Docket No. 17-035-26

MOTION AND CONSENT OF SPONSORING LOCAL COUNSEL FOR PRO HAC VICE ADMISSION OF KAREN KRUSE

Pursuant to Rule 14-806 of the Utah Code of Judicial Administration, Yvonne R. Hogle, moves the Commission for an order admitting Karen Kruse *pro hac vice* to act as counsel in the above-captioned matter on the following basis: PacifiCorp d/b/a Rocky Mountain Power has retained the services of Ms. Kruse, an attorney for PacifiCorp d/b/a Pacific Power, who is neither licensed to practice law in the State of Utah nor a resident of Utah. Ms. Kruse is admitted to practice

in the State of Oregon where she is an attorney in good standing as evidenced by the original Certificate of Good Standing and application submitted to the Utah State Bar. As required by Rule 14-806, both a filing fee and Ms. Kruse's original Application have been submitted to the Utah State Bar. Yvonne R. Hogle, hereby agrees to serve as designated local counsel for the subject case. She agrees to comply with all applicable provisions of the Utah Rules of Administrative Procedure, Utah Rules of Civil Procedure, and the Utah Code of Judicial Administration, and to readily communicate with opposing counsel and the Commission regarding the conduct of this case. She also agrees to accept papers when served as well as recognize the responsibility to act for and on behalf of the clients in all case-related proceedings, including hearings, pretrial conferences, and trials, should Ms. Kruse fail to respond to any order of the Commission. Filed with this motion are the Acknowledgment from the Utah State Bar (**Exhibit A**), a copy of Ms. Kruse's pro hac vice admission application (**Exhibit B**), a copy of Ms. Kruse's certificate of good standing from the Oregon State Bar (**Exhibit C**), and a proposed Order admitting Ms. Kruse (**Exhibit D**).

DATED this 5th day of October, 2017.

Respectfully Submitted, ROCKY MOUNTAIN POWER

/s/ Yvonne R. Hogle Yvonne R. Hogle

Attorney for Rocky Mountain Power Docket No. 17-035-26

EXHIBIT A

ACKNOWLEDGMENT FROM THE UTAH STATE BAR



John C. Baldwin Executive Director

Board of Bar Commissioners

John R. Lund President Parsons Behle & Latimer Salt Lake City

H. Dickson Burton President-elect TraskBritt Salt Lake City

S. Grace Acosta Lewis Hansen Law Firm Salt Lake City

John W. Bradley Utah Attorney General's Office Ogden

Steven R. Burt, AIA Public Member Entelen Design Build Salt Lake City

Kate A. Conyers Salt Lake Legal Defenders Assoc. Salt Lake City

Heather M. Farnsworth Match & Farnsworth Salt Lake City

Mary Kay Griffin, CPA Public Member Mayer Hoffman McCann Salt Lake City

Liisa A. Hancock Jeffs & Jeffs Provo

Mark O. Morris Snell & Wilmer Salt Lake City

Michelle Mumford Attorney at Law Salt Lake City

Herm Olsen Hillyard Anderson & Olsen Logan

Cara M. Tangaro Tangaro Law Firm Salt Lake City

Heather L. Thuet Christensen & Jensen Salt Lake City

Kristin K. Woods Attorney at Law St. George

Utah State Bar.

645 South 200 East, Suite 310 • Salt Lake City, Utah 84111-3834 Telephone: 801-531-9077 • Fax: 801-531-0660 http://www.utahbar.org

ACKNOWLEDGEMENT OF SUPPORTING DOCUMENTATION AND RECEIPT OF PRO HAC VICE FILING FEE

Date Issued:October 4, 2017Case Name:In the Matter of the Application of Rocky Mountain Power for Approval
of the Power Purchase Agreement between PacifiCorp and Glen Canyon
Solar A, LLC
Before The Public Service Commission of UtahCase Number:17-035-26

This letter serves as an acknowledgement that the \$250.00 pro hac vice filing fee for **KAREN KRUSE** in the above-referenced case has been paid to the Utah State Bar and that the required supporting documentation is complete and in good order. If you have any questions, please call the Bar at (801) 531-9077.

Brady M. Whitehead Paralegal to General Counsel

Note to Counsel: An original motion signed by a member of the Utah State Bar who expressly consents to appearing as associate counsel should be filed with the court along with: (1) copies of the Application and Certificate of Good Standing which were provided to the Bar; (2) this Acknowledgement of Supporting Documentation and Receipt of Pro Hac Vice Filing Fee; and (3) a proposed order.

Serving the public. Working for justice.

EXHIBIT B

PRO HAC VICE ADMISSION APPLICATION

APPLICATION FOR ADMISSION PRO HAC VICE

manner or it will	Court generated and a not be accepted. This	form cannot be s	ubmitted el	ectronically
	<u>s an original signatur</u>		n. You must	fill it out and
print it for signatur	e and notary purposes.			
Name:	KAREN KRUSE			
Firm Name:	PacifiCord d/b/a Pacific Power			
Address:	825 NE Multnomah Street, Suite 20	00		
City, State, Zip:	Portland	OR	97232	
Telephone / Fax:	503 813 5863	503 81	3 7252	
E-mail (if any):	Karen.Kruse@pacificorp.com			
State(s) to Which	Admitted		Bar	Number
OREGON	1016 (1016 - 1116 I.A.		112733	
DISTRICT OF COLUMBIA			NA	
	an landar watan watan di sa		L	j
	plicant wishes to app	ear:		
Case Name		Application of Rocky Mo	untain Power for A	Approval of the Power Purc
Court		THE PUBLIC SERVICE CO	MMISSION OF UT	AH
Case Number		Docket No. 17-035-26		
Party on whose behalf Applicant seeks to appear		Rocky Mountain Power		
	te or federal court in Utah in in the previous five years.			
Case Name		Case Number		Court

Are you (the Applicant) currently suspended or disbarred from the practice of law in any state?

If yes, please explain: NA

Have you (the Applicant) been disciplined by any state's or court's bar organization in the prior five (5) years? N_0

If yes, please explain: NA Are you (the Applicant) the subject of any pending disciplinary proceedings by any state's or court's bar organization?

Sponsoring Local Counsel: (must be a Utah resident)

Name:	Yvonne Hogle	
Firm Name:	PacifiCorp d/h/a Rocky Mountain Power	
Utah Bar Number:	7550	
Address:	1407 West North Temple, Suite 320	
City, State, Zip:	Salt Lake City 1/T 84116	
Telephone / Fax:	801.220.4050 801.220.3299	
E-mail (if any):	Yvonne.Hogle@pacificorp.com	

Applicant's Certification and Signature:

Applicant certifies the following:

- Applicant submits to the disciplinary authority and procedures of the Utah State Bar.
- Applicant is familiar with the rules of procedure and evidence, including applicable local rules.
- Applicant will be available for depositions, hearings and conferences.
- Applicant will comply with the rulings and orders of the court.
- All the information included in this application is accurate.
- Applicant will comply with the Utah Standards of Professionalism and Civility.

Applicant must attach to this application an original, current (issued within 60 days of the date of Application) Certificate of Good Standing from the licensing state in which the applicant resides. (Applicants may not reside in Utah.)

May 10, 2019		OFFICIAL STAMP TIFFANY LEE BROWN NOTARY PUBLIC-OREGON COMMISSION NO. 938864
My Commission Expires:	Notal Qubic	und, DR.
(Name of Applicant)	Jupping A	\sim
by Kalen Knase	1 day of Septemic	Der, 2017
:ss COUNTY OF MULTNOMAH)		
STATE OF OREGON)		
Applicant's Signature: Kare	~ Kruse	
DATED this 29 day of Septer	mber ,2017.	

MY COMMISSION EXPIRES MAY 10, 2019

Jan

EXHIBIT C

CERTIFICATE OF GOOD STANDING FROM THE OREGON STATE BAR



Certificate

State of Oregon)) ss. County of Washington)

I, Nik T. Chourey, do hereby certify that I am an Assistant Disciplinary Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

KAREN KRUSE

was admitted to practice law in the State of Oregon by reciprocity and became an active member of the Oregon State Bar on August 12, 2011.

There are no complaints, grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

Ms. Kruse is an active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 31st day of August, 2017.

Nik T. Chourey Assistant Disciplinary Counsel Oregon State Bar

16037 SW Upper Boones Ferry Road, PO Box 231935, Tigard, Oregon 97281-1935 (503) 620-0222 or (800) 452-8260 Regulatory Services fax (503) 968-4457 EXHIBIT C 1 of 1

www.osbar.org

EXHIBIT D

PROPOSED ORDER GRANTING PRO HAC VICE ADMISSION

R. Jeff Richards (7294) Yvonne R. Hogle (7550) PacifiCorp d/b/a Rocky Mountain Power 1407 West North Temple, Suite 320 Salt Lake City, UT 84116 Telephone: 801-220-4050 Facsimile: 801-220-3299 E-mail: <u>Robert.Richards@pacificorp.com</u> E-mail: <u>Yvonne.Hogle@pacificorp.com</u>

Sarah K. Link Karen J. Kruse PacifiCorp d/b/a Pacific Power 825 NE Multnomah St., Suite 2000 Portland, Oregon 97232 Telephone: 503-813-5865 E-mail: <u>Sarah.Link@pacificorp.com</u> E-mail: <u>Karen.Kruse@pacificorp.com</u>

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of the Power Purchase Agreement between PacifiCorp and Glen Canyon Solar A, LLC Docket No. 17-035-26

[PROPOSED] ORDER GRANTING PRO HAC VICE ADMISSION OF KAREN KRUSE

Based on the motion for admission *pro hac vice* of Karen Kruse, the consent of sponsoring local counsel Yvonne R. Hogle, and a finding by the Commission that admission *pro hac vice* of Ms. Kruse will serve the interests of the parties and the efficient and just administration of the docket, it is hereby ordered that Ms. Kurse be admitted *pro hac vice* as counsel for the PacifiCorp in the above-referenced docket.

DATED this _____ of _____ 2017.

_

Commission

Commission

Commission

Attest:

Commission Secretary

Docket No. 17-035-26

CERTIFICATE OF SERVICE

I CERTIFY that on the ____ day of _____, 2017, a true and correct copy of the foregoing was served by electronic mail upon the following:

Hatch, James & Dodge, P.C.

For Glen Canyon Solar A, LLC & Glen Canyon Solar B, LLC Gary A. Dodge - <u>gdodge@hjdlaw.com</u> Phillip J. Russell - <u>prussell@hjdlaw.com</u>

Utah Office of Consumer Services Cheryl Murray - <u>cmurray@utah.gov</u> Michele Beck - <u>mbeck@utah.gov</u>

Division of Public Utilities

Chris Parker - <u>ChrisParker@utah.gov</u> William Powell - <u>wpowell@utah.gov</u> Erika Tedder - <u>etedder@utah.gov</u>

Assistant Attorney General

For Division of Public Utilities Patricia Schmid - pschmid@agutah.gov Justin Jetter - jjetter@agutah.gov For Utah Office of Consumer Services Robert Moore - rmoore@agutah.gov Steven Snarr - stevensnarr@agutah.gov

Rocky Mountain Power

Robert C. Lively - <u>bob.lively@pacificorp.com</u> Yvonne Hogle - <u>yvonne.hogle@pacifcorp.com</u> Jeff Richards - <u>robert.richards@pacificorp.com</u>

Pacific Power

Sarah K. Link - <u>sarah.link@pacificorp.com</u> Karen J. Kruse - <u>karen.kruse@pacificorp.com</u>

Administrative Assistant

CERTIFICATE OF SERVICE

Docket No. 17-035-26

I hereby certify that on October 5, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Cheryl Murray	cmurray@utah.gov
Michele Beck	mbeck@utah.gov

Division of Public Utilities

Erika Tedder etedder@utah.gov

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Rocky Mountain Power

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Daniel Solander	daniel.solander@pacificorp.com

Pacific Power

Sarah Link	sarah.link@pacificorp.com
Karen Kruse	karen.kruse@pacificorp.com

Hatch, James & Dodge, P.C.

For Glen Canyon Solar A, LLC & Glen Canyon Solar B, LLC Gary A. Dodge gdodge@hjdlaw.com Phillip J. Russell prussell@hjdlaw.com

Jennifer An Supervisor, Regulatory Operations