

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

September 27, 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. 17-035-36 – In the Matter of Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC's Request for Agency Action to Adjudicate Rights and Obligations under PURPA, Schedule 38 and Power Purchase Agreements with Rocky Mountain Power

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 Sarah K. Link.

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 Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC's Request for Agency Action to Adjudicate Rights and Obligations under PURPA, Schedule 38 and Power Purchase Agreements with Rocky Mountain Power Docket No. 17-035-36

MOTION AND CONSENT OF SPONSORING LOCAL COUNSEL FOR PRO HAC VICE ADMISSION OF SARAH K. LINK

Pursuant to Rule 14-806 of the Utah Code of Judicial Administration, Yvonne R. Hogle, moves the Commission for an order admitting Sarah K. Link *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. Link, 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. Link 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. Link'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. Link 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. Link's pro hac vice admission application (**Exhibit B**), a copy of Ms. Link's certificate of good standing from the Oregon State Bar (**Exhibit C**), and a proposed Order admitting Ms. Link (**Exhibit D**).

DATED this 27th day of September, 2017.

Respectfully Submitted, ROCKY MOUNTAIN POWER

/s/ Yvonne R. Hogle Yvonne R. Hogle

Attorney for Rocky Mountain Power Docket No. 17-035-36

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

Llisa 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:September 25, 2017Case Name:In the Matter of Glen Canyon Solar A, LLC, et al.
Before the Public Service Commission of UtahCase Number:17-035-36

This letter serves as an acknowledgement that the \$250.00 pro hac vice filing fee for **SARAH K. LINK** 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-Coursel

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.

EXHIBIT B

PRO HAC VICE ADMISSION APPLICATION

APPLICATION FOR ADMISSION PRO HAC VICE

NOTE: This is a Court generated and approved form that cannot be altered in any manner or it will not be accepted. This form cannot be submitted electronically because it requires an original signature and notarization. You must fill it out and print it for signature and notary purposes.

Name:	SARAH K LINK							
Firm Name:	PacifiCoro d/b/a Pacific Power							
Address:	825 NE Multnomah Street, Suite 200	00						
City, State, Zip:	Portland]	OR		97232		
Telephone / Fax:	503 813 5865		Ľ	503 813	7252			
E-mail (if any):	Sarah.Link@pacificorp.com							
State(s) to Which	Admitted					Bar	Number	
OREGON					002926	5		
WASHINGTON				[30863			
CALIFORNIA				[185640)		
Case in which Ap Case Name Court	plicant wishes to appo [[Glen Canyon Solar B,	
Case Number		Docket No. 17-	035-36	5				
Party on whose b seeks to appear	ehalf Applicant	Rocky Mountai	in Pow	ver				
Other cases in any stat appeared pro hac vice	te or federal court in Utah ir in the previous five years.	n which the a (Attach addi	ippli tiona	cant or al shee	meml ts if no	ber of ap cessary	oplicant's firm ha .)	S
Case Name		Case N	lum	ber		······	Court	
				·				
Are you (the Applicar	nt) currently suspended or di	isbarred from	1 the	practi	ce of l	aw in ar	iy state?]
If yes inlease explain:	NA							

Have you (the Applicant) been disciplined by any state's or court's bar organization in the prior five (5) HIBIT B years? $\boxed{N_0}$ 1 of 2

If yes, please explain:	Νλ
Are you (the Applicant	t) 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/b/a Rocky Mountain Power					
Utah Bar Number:	7550					
Address:	1407 West North Temple, Suite 320					
City, State, Zip:	Salt Lake City, UT 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.)

DATED this 11th day of September 2017.
Applicant's Signature: Mr. L. Jurk
STATE OF OREGON)
:ss COUNTY OF MULTNOMAH)
Signed and sworn to before me on the <u>11th</u> day of <u>September</u> , 2017
Uname of Application Stamp
PATRICIA ANN DEAS NOTARY PUBLIC-OREGON COMMISSION NO. 937208
My COMMISSION EXPIRES MARCH 12, 2019 My Commission Expires: My Commission Expires:
Ny Contribution Expires.

MArch 12,2019

EXHIBIT B 2 of 2

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:

SARAH K. LINK

was admitted to practice law in the State of Oregon by examination and became an active member of the Oregon State Bar on October 4, 2000.

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. Link 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

> EXHIBIT C 1 of 1

 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

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>

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In the Matter of Glen Canyon Solar A, LLC and Glen Canyon Solar B, LLC's Request for Agency Action to Adjudicate Rights and Obligations under PURPA, Schedule 38 and Power Purchase Agreements with Rocky Mountain Power Docket No. 17-035-36

[PROPOSED] ORDER GRANTING PRO HAC VICE ADMISSION OF SARAH K. LINK

Based on the motion for admission *pro hac vice* of Sarah Link, the consent of sponsoring local counsel Yvonne R. Hogle, and a finding by the Commission that admission *pro hac vice* of Ms. Link will serve the interests of the parties and the efficient and just administration of the docket, it is hereby ordered that Ms. Link 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. 17-035-36

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 – <u>pschmid@agutah.gov</u> Justin Jetter – <u>jjetter@agutah.gov</u>

For Utah Office of Consumer Services Robert Moore – <u>rmoore@agutah.gov</u> Steven Snarr – <u>stevensnarr@agutah.gov</u>

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>

Arizona Public Service Company

Jennifer L. Spina – <u>Jennifer.Spina@pinnaclewest.com</u> Elizabeth M. Brereton – <u>lbrereton@swlaw.com</u>

Administrative Assistant

CERTIFICATE OF SERVICE

Docket No. 17-035-36

I hereby certify that on September 27, 2017, a true and correct copy of the foregoing was served by electronic mail to 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 – prussell@hjdlaw.com

Utah Office of Consumer Services

Cheryl Murray – <u>cmurray@utah.gov</u> Michele Beck – <u>mbeck@utah.gov</u>

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Assistant Attorney General

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For Utah Office of Consumer Services Robert Moore – <u>rmoore@agutah.gov</u> Steven Snarr – <u>stevensnarr@agutah.gov</u>

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Arizona Public Service Company

Jennifer L. Spina – <u>Jennifer.Spina@pinnaclewest.com</u> Elizabeth M. Brereton – <u>lbrereton@swlaw.com</u>

Supervisor, Regulatory Operations