



*Yvonne R. Hogle*  
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*801.220.3299 Fax*

September 27, 2017

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> 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 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,

A handwritten signature in blue ink that reads "Yvonne R. Hogle".

Yvonne R. Hogle  
Assistant General Counsel

Enclosures

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Yvonne R. Hogle (7550)  
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Salt Lake City, UT 84116  
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*Attorneys for Rocky Mountain Power*

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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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  <b>MOTION AND CONSENT OF SPONSORING LOCAL COUNSEL FOR PRO HAC VICE ADMISSION OF KAREN KRUSE</b>
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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 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



# 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>

John C. Baldwin  
Executive Director

## Board of Bar Commissioners

John R. Lund  
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Salt Lake City

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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

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Public Member  
Mayer Hoffman McCann  
Salt Lake City

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Jeffer & Jeffs  
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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

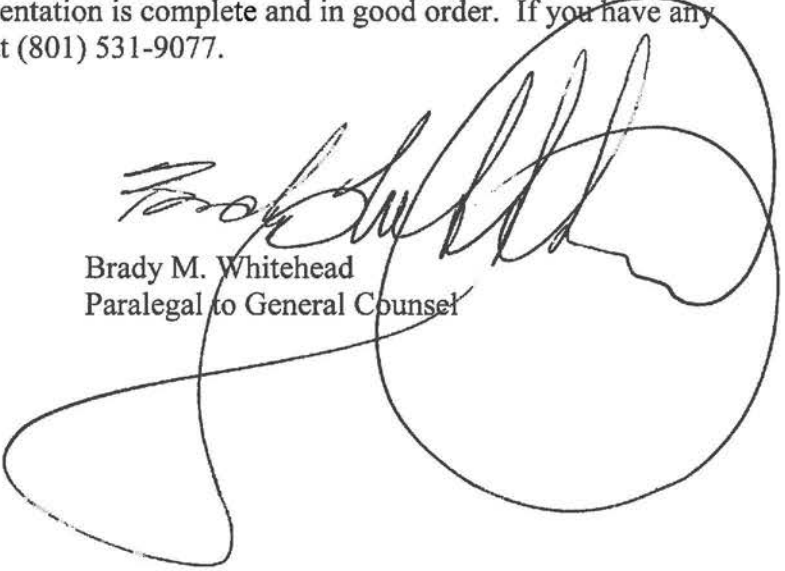
Heather L. Thuet  
Christensen & Jensen  
Salt Lake City

Kristin K. Woods  
Attorney at Law  
St. George

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

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

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.

EXHIBIT A  
1 of 1

**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:**

**Firm Name:**

**Address:**

**City, State, Zip:**

**Telephone / Fax:**

**E-mail (if any):**

State(s) to Which Admitted	Bar Number
<input type="text" value="OREGON"/>	<input type="text" value="112733"/>
<input type="text" value="DISTRICT OF COLUMBIA"/>	<input type="text" value="NA"/>
<input type="text"/>	<input type="text"/>

**Case in which Applicant wishes to appear:**

**Case Name**

**Court**

**Case Number**

**Party on whose behalf Applicant seeks to appear**

Other cases in any state or federal court in Utah in which the applicant or member of applicant's firm has appeared pro hac vice in the previous five years. (Attach additional sheets if necessary.)

Case Name	Case Number	Court
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

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

If yes, please explain:

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

**EXHIBIT B**

If yes, please explain:

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:**

**Firm Name:**

**Utah Bar Number:**

**Address:**

**City, State, Zip:**

**Telephone / Fax:**

**E-mail (if any):**

**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 11<sup>th</sup> day of September, 2017.

Applicant's Signature: Karen Kruse

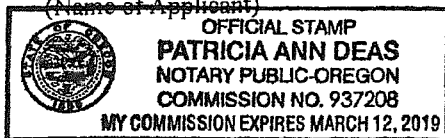
STATE OF OREGON )

:ss

COUNTY OF MULTNOMAH )

Signed and sworn to before me on the 11<sup>th</sup> day of September, 2017  
by KAREN KRUSE

(Name of Applicant)



My Commission Expires:

March 12, 2019

Patricia Deas  
Notary Public  
Residing at: Multnomah, Portland, OR



**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 31<sup>st</sup> day of August, 2017.



Nik T. Chourey  
Assistant Disciplinary Counsel  
Oregon State Bar

**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  
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E-mail: [Yvonne.Hogle@pacificorp.com](mailto:Yvonne.Hogle@pacificorp.com)

Sarah K. Link  
Karen J. Kruse  
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E-mail: [Karen.Kruse@pacificorp.com](mailto:Karen.Kruse@pacificorp.com)

*Attorneys for Rocky Mountain Power*

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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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
	<b>[PROPOSED] ORDER GRANTING PRO HAC VICE ADMISSION OF KAREN KRUSE</b>

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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. Kruse be admitted *pro hac vice* as counsel for the PacifiCorp in the above-referenced docket.

DATED this \_\_\_\_ of \_\_\_\_\_ 2017.

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Commission

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Commission

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Commission

Attest:

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Commission Secretary

**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 – [gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)

Phillip J. Russell – [prussell@hjdllaw.com](mailto:prussell@hjdllaw.com)

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Michele Beck – [mbeck@utah.gov](mailto:mbeck@utah.gov)

**Division of Public Utilities**

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**Assistant Attorney General**

*For Division of Public Utilities*

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Jeff Richards – [robert.richards@pacificorp.com](mailto:robert.richards@pacificorp.com)

**Pacific Power**

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Karen J. Kruse – [karen.kruse@pacificorp.com](mailto:karen.kruse@pacificorp.com)

**Arizona Public Service Company**

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Elizabeth M. Brereton – [lbrereton@swlaw.com](mailto:lbrereton@swlaw.com)

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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 – [gdodge@hjdllaw.com](mailto:gdodge@hjdllaw.com)

Phillip J. Russell – [prussell@hjdllaw.com](mailto:prussell@hjdllaw.com)

**Utah Office of Consumer Services**

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Michele Beck – [mbeck@utah.gov](mailto:mbeck@utah.gov)

**Division of Public Utilities**

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**Assistant Attorney General**

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**Pacific Power**

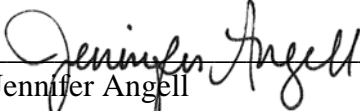
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Karen J. Kruse – [karen.kruse@pacificorp.com](mailto:karen.kruse@pacificorp.com)

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Elizabeth M. Brereton – [lbrereton@swlaw.com](mailto:lbrereton@swlaw.com)

  
Jennifer Angell  
Supervisor, Regulatory Operations