

TORMOEN HICKEY LLC  
Lisa Tormoen Hickey, Colo. Reg. #15046  
P.O. Box 7920  
Colorado Springs, CO 80933  
Telephone: 719-302-2142  
E-mail: lisahickey@newlawgroup.com

**BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH**

---

In the Matter of Rocky Mountain Power's 2019 Integrated Resource Plan	)	)	Docket No. 19-035-02
	)	)	

---

**MOTION FOR PERMISSION TO BE REPRESENTED  
BY OUT-OF-STATE ATTORNEY**

---

A. Pursuant to Rule 14-806(b)(2) of the Utah Supreme Court Rules of Professional Practice (May, 2019) and Rule R746-1-107 of the Rules of Practice and Procedure of the Utah Public Service Commission, the undersigned attorney, licensed in Colorado and Wyoming (at times, "Counsel"), asks that she be allowed to represent a party in this proceeding without associated Utah counsel. Counsel moves for permission to represent the Interwest Energy Alliance, which has submitted a petition for intervention in this proceeding.

B. Admission of Counsel pursuant to this application would serve the interests of the parties and the efficient and just administration of the case.<sup>1</sup> Hiring local representation by an attorney licensed in Utah would pose an unreasonable hardship and financial burden upon

---

<sup>1</sup> Rule 14-806(c), Utah Rules of Prof. Practice, states:

(c) Nonresident counsel may be permitted to appear in a particular case or proceeding if the court or administrative or governmental body in which the matter is pending determines that admission *pro hac vice* will serve the interests of the parties and the efficient and just administration of the case.

Interwest. Interwest has already engaged the undersigned attorney on a regular basis to participate in regulatory proceedings, and it would be a costly burden on its limited resources to engage local counsel who would have to be retained in addition to the undersigned. Interwest intends to provide information and analysis which will be helpful for a thorough consideration of the relevant issues presented by the 2019 IRP.

**R746-1-107. Representation of Parties, states as follows:**

- (1) A party may:
  - (a) be represented by:
    - (i) an attorney licensed to practice in Utah; or
    - (ii) an attorney licensed in a foreign state, if the attorney provides the Commission with a certificate of good standing from the state where licensed;*
  - (b) represent oneself individually; or
  - (c) if not an individual, represent itself through an officer or employee.
- (2) An attorney who appears pursuant to Subsection R746-1-107(1)(a)(ii) is not required to:*
  - (a) apply for pro hac vice admission to the Utah State Bar; or*
  - (b) partner with counsel licensed in Utah.*

(emphasis added). Counsel is an attorney licensed in Colorado and Wyoming. A certificate of good standing from Colorado is attached as **Exhibit A** and a certificate of good standing from Wyoming is attached as **Exhibit B**.

C. Counsel represents Interwest on a regular basis related to multi-state activities, and has previously represented Interwest in Utah regulatory dockets, including Docket No. 17-035-40, related to the new wind and transmission recommended as part of PacifiCorp's Energy Vision (in which docket Interwest did retain and was also represented by local counsel), and the 2017 IRP, Docket No. 17-035-16. Counsel regularly collaborates with other regulatory counsel in Utah. The purpose and scope of intervention is to file comments and/or expert testimony and to obtain

discovery. The undersigned is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court.

D. Having complied with the applicable statute and rules, the undersigned respectfully requests admission *pro hac vice* to represent the Interwest Energy Alliance in this proceeding.

Respectfully submitted this 11<sup>th</sup> day of December, 2019.

TORMOEN HICKEY LLC

By: /s/ Lisa Tormoen Hickey

Lisa Tormoen Hickey

Colo. Reg. #15046, WY 5-2346

P.O. Box 7920

Colorado Springs, CO 80933

Telephone: 719-302-2142

E-mail: [lisahickey@newLawgroup.com](mailto:lisahickey@newlawgroup.com)

**On Behalf of Interwest Energy Alliance**

**Interwest Energy Alliance (no separate copies of notices or pleadings required)**

**Rikki Seguin, Executive Director**

**400 Gold Ave. SW Suite 700**

**Albuquerque, NM 87102**

**[rikki@interwest.org](mailto:rikki@interwest.org)**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was efiled and served by email this 11<sup>th</sup> day of December, as follows:

[psc@utah.gov](mailto:psc@utah.gov), Utah Public Service Commission

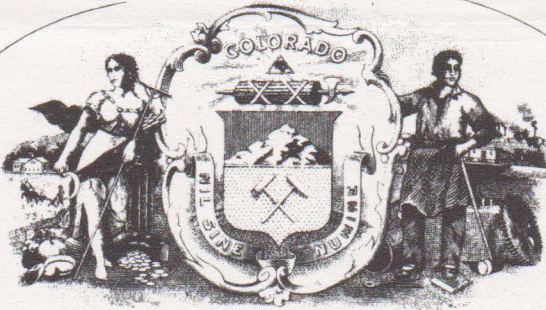
ROCKY MOUNTAIN POWER  Yvonne Hogle Yvonne Hogle ( <a href="mailto:yvonne.hogle@pacificorp.com">yvonne.hogle@pacificorp.com</a> ) Data Request Response Center ( <a href="mailto:datarequest@pacificorp.com">datarequest@pacificorp.com</a> ) Utah Dockets <a href="mailto:Utahdockets@pacificorp.com">Utahdockets@pacificorp.com</a> Jana Saba <a href="mailto:Jana.saba@pacificorp.com">Jana.saba@pacificorp.com</a> Joelle Steward <a href="mailto:Joelle.Steward@pacificorp.com">Joelle.Steward@pacificorp.com</a>	DIVISION OF PUBLIC UTILITIES Erika Tedder ( <a href="mailto:etedder@utah.gov">etedder@utah.gov</a> )  ASSISTANT UTAH ATTORNEYS GENERAL Patricia Schmid ( <a href="mailto:pschmid@agutah.gov">pschmid@agutah.gov</a> ) Justin Jetter ( <a href="mailto:jjetter@agutah.gov">jjetter@agutah.gov</a> ) Chris Parker ( <a href="mailto:chrisparker@utah.gov">chrisparker@utah.gov</a> ) William Powell wpowell@utah.gov <a href="mailto:dpudatarequest@utah.gov">dpudatarequest@utah.gov</a>	OFFICE OF CONSUMER SERVICES  Office of Consumer Services  Robert Moore <a href="mailto:rmoore@agutah.gov">rmoore@agutah.gov</a> Steven Snarr <a href="mailto:stevensnarr@agutah.gov">stevensnarr@agutah.gov</a>  Michele Beck ( <a href="mailto:mbeck@utah.gov">mbeck@utah.gov</a> ) Cheryl Murray ( <a href="mailto:cmurray@utah.gov">cmurray@utah.gov</a> ) Bela Vastag ( <a href="mailto:bvastag@utah.gov">bvastag@utah.gov</a> ) Madison Galt ( <a href="mailto:mgalt@utah.gov">mgalt@utah.gov</a> )
UTAH ASSOCIATION OF ENERGY USERS  Gary Dodge ( <a href="mailto:gdodge@hjdllaw.com">gdodge@hjdllaw.com</a> ) Phillip J. Russell ( <a href="mailto:prussell@hjdllaw.com">prussell@hjdllaw.com</a> )	UTAH CLEAN ENERGY  <a href="mailto:hunter@utahcleanenergy.org">hunter@utahcleanenergy.org</a> kate@utahcleanenergy.org sarah@utahcleanenergy.org	
		Western Resource Advocates  <a href="mailto:sophie.hayes@westernresources.org">sophie.hayes@westernresources.org</a> <a href="mailto:Nancy.kelly@westernresource.org">Nancy.kelly@westernresource.org</a> smichel@westernresources.org

/s/Lisa Tormoen Hickey  
Lisa Tormoen Hickey

/s/Lisa Tormoen Hickey  
Lisa Tormoen Hickey



# SUPREME COURT



## State of Colorado,

STATE OF COLORADO, ss:

I, Cheryl Stevens Clerk of the Supreme Court of the State of Colorado, do hereby certify that

ELIZABETH TORMOEN HICKEY

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 1<sup>st</sup>

day of November A. D. 1985 and that at the date hereof the said ELIZABETH TORMOEN HICKEY

is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

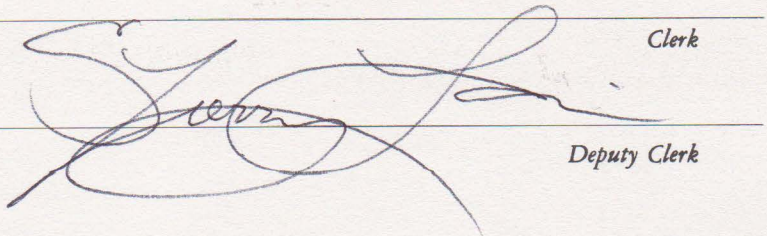
4<sup>th</sup>

day of December A. D. 2019

Cheryl Stevens

Clerk

By



Deputy Clerk



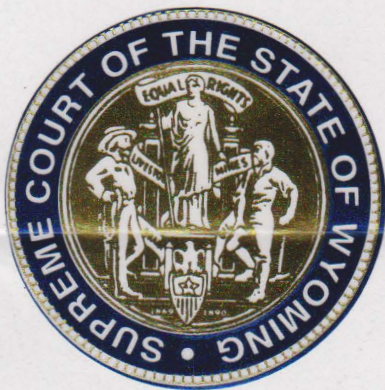
**CERTIFICATE OF THE CLERK OF THE SUPREME COURT  
OF THE  
STATE OF WYOMING**

---

I, Patricia Bennett, Clerk of the Supreme Court of the State of Wyoming, hereby certify that, according to the records of my office:

**Elizabeth Tormoen Hickey**

was on the 26th day of September, 1986, duly admitted to practice as an Attorney and Counsellor at Law in all the courts of Wyoming; that the above admittee has never been disbarred or suspended; that no disciplinary proceedings are pending against this admittee; and that this admittee's name now appears on the Roll of Attorneys in this office as a member of the bar in good standing.



Given under my hand and the seal of said  
Court this 2nd day of December, 2019.

A handwritten signature in blue ink, appearing to read "Pat Bennett", is written over a horizontal line.

Patricia Bennett, Clerk