

TORMOEN HICKEY LLC
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BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

Application of Rocky Mountain Power for Approval of a)
Solicitation Process for 2020 All Source Request for) Docket No. 20-035-05
Proposals)

**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 motion would serve the interests of the parties and the efficient and just administration of the case. Hiring local representation by an attorney licensed in Utah would pose an unreasonable hardship and financial burden upon 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

written comments which will be helpful for a thorough consideration of the relevant issues to help ensure fairness and clarity in the review of the 2020 All Source Request for Proposals.

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**. Pursuant to this rule, application for *pro hac vice* status is not required, but admission is allowed based on the discretion of the Commission, subject to compliance as stated above.

C. Permission to be represented by the undersigned will help preserve efficiency because Counsel is familiar with Utah administrative proceedings. Counsel represents Interwest on a regular basis related to multi-state activities, and has previously represented Interwest in Utah regulatory dockets, including, but not limited to Docket No. 19-035-02, related to review of PacifiCorp's 2019 Integrated Resource Plan, Docket No. 17-035-40, related to the new wind and transmission recommended as part of PacifiCorp's 2020 Energy Vision (in which docket Interwest did retain and was also represented by local counsel), and the 2017 IRP, Docket No. 17-035-16.

D. Counsel regularly collaborates with other regulatory counsel in Utah. The undersigned is committed to adhering to the Utah Standards of Professionalism and Civility adopted by the Utah Supreme Court.

E. Having complied with the applicable statute and rules, Interwest requests permission to be represented by the undersigned Counsel to be admitted for this purpose as counsel of record in this proceeding.

F. If approved, service upon Interwest for different formats (pleadings, discovery) through the undersigned is requested as follows:

If by U.S. Mail, to: Lisa Tormoen Hickey Tormoen Hickey LLC P.O. Box 7920 Colorado Springs, CO 80933 lisahickey@newlawgroup.com	If by FEDEX, to: Lisa Tormoen Hickey Tormoen Hickey LLC 3225 Templeton Gap Road Suite 217 Colorado Springs, CO 80907 (719) 302-2142
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Respectfully submitted this 6th day of May, 2020.

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

On Behalf of Interwest Energy Alliance

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was efiled and served by email this 6th day of May, 2020, as follows:

psc@utah.gov, Utah Public Service Commission

<p>ROCKY MOUNTAIN POWER Data Request Response Center (datarequest@pacificorp.com) Utah Dockets Utahdockets@pacificorp.com Jacob McDermott Jacob.mcdermott@pacificorp.com Jana Saba Jana.saba@pacificorp.com Joelle Steward Joelle.Steward@pacificorp.com</p>	<p>DIVISION OF PUBLIC UTILITIES ASSISTANT UTAH ATTORNEYS GENERAL Patricia Schmid (pschmid@agutah.gov) Justin Jetter (jjetter@agutah.gov) Chris Parker (chrisparker@utah.gov) William Powell wpowell@utah.gov dpudatarequest@utah.gov</p>	<p>OFFICE OF CONSUMER SERVICES Office of Consumer Services Robert Moore rmoore@agutah.gov Steven Snarr stevensnarr@agutah.gov Michele Beck (mbeck@utah.gov) Cheryl Murray (cmurray@utah.gov)</p>
<p>UTAH ASSOCIATION OF ENERGY USERS Phillip Russell James Dodge Russell & Stephens, PC prussell@jdrslaw.com</p>		

/s/ Lisa Tormoen Hickey
Lisa Tormoen Hickey

EXHIBIT A
CERTIFICATE OF GOOD STANDING
COLORADO BAR ASSOCIATION
ELIZABETH (LISA) TORMOEN HICKEY, ATTORNEY

**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 27th day of April, 2020.

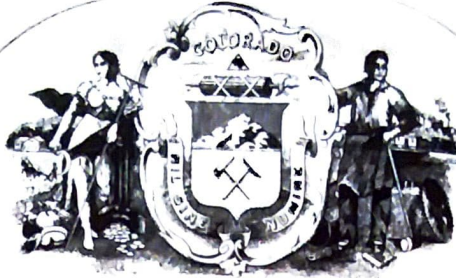
Patricia Bennett, Clerk


by deputy



EXHIBIT B
CERTIFICATE OF GOOD STANDING
WYOMING BAR ASSOCIATION
ELIZABETH (LISA) TORMOEN HICKEY, ATTORNEY

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 1st

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

29th day of April A. D. 2020

Cheryl Stevens

Clerk

By

Deputy Clerk