

TORMOEN HICKEY LLC
Lisa Tormoen Hickey, Colo. #15046, WY #5-2436
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BEFORE THE PUBLIC UTILITIES COMMISSION OF UTAH

Application of Rocky Mountain Power for a)
Certificate of Public Convenience and)
Necessity for the Gateway South Transmission) Docket No. 21-035-54
Project)
)

**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, **Lisa Tormoen Hickey**, 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 fully participate in this docket, which will be helpful for a thorough consideration of the relevant issues to help ensure fairness and clarity in the review of the CPCN request.

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, *In the Matter 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 *In the Matter of the PacifiCorp's 2017 Integrated Resource Plan*, 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:

Nate Blouin Interwest Energy Alliance 2647 Jasper Street Salt Lake City, UT 84106 nate@interwest.org 603.724.3266	Lisa Tormoen Hickey Tormoen Hickey LLC P.O. Box 7920 Colorado Springs, CO 80933 lisahickey@newlawgroup.com 717.302.2142	
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Respectfully submitted this 19th day of October, 2021.

TORMOEN HICKEY LLC

By: /s/ Lisa Tormoen Hickey

Lisa Tormoen Hickey

Colo. Reg. #15046, WY #5-2346

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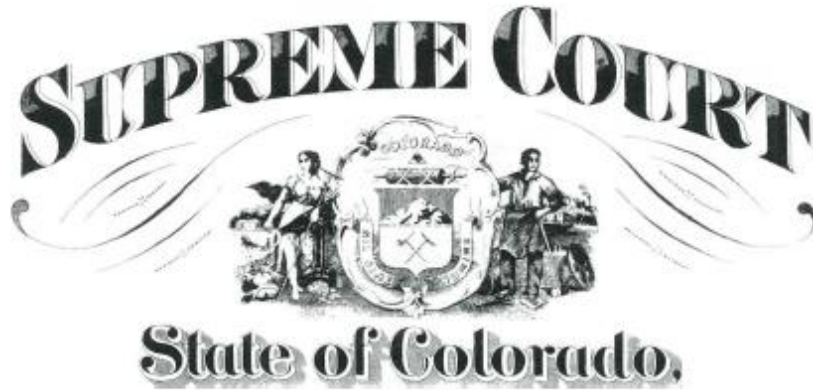
E-mail: lisahickey@newlawgroup.com

On Behalf of Interwest Energy Alliance

Attachments: Exhibit A, Certificate of Good Standing, Colorado

Exhibit B, Certificate of Good Standing, Wyoming

EXHIBIT A



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 hereto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

8th day of September A.D. 2021

Cheryl Stevens

Clerk

By

A handwritten signature in black ink, appearing to be "S. Stevens", written over a horizontal line.

Deputy Clerk

EXHIBIT B

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

I, Shawna Goetz, 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 3rd day of September, 2021.

Shawna Goetz, Clerk

Laura Muckey

by deputy

EXHIBIT B

CERTIFICATE OF SERVICE
21-035-54

I hereby certify that a true and correct copy of the foregoing was efiled and served by email this 19th day of October, 2021, 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 Jana Saba Jana.saba@pacificorp.com Richard Garlish Richard.garlish@pacificorp.com Emily Wegener Emily.wegener@pacificorp.com John Hutchings john.hutchings@pacificorp.com Katherine McDowell katherine@mrg-law.com Adam Lowney adam@mrg-law.com</p>	<p>DIVISION OF PUBLIC UTILITIES Chris Parker chrisparker@utah.gov William Powell wpowell@utah.gov Madison Galt mgalt@utah.gov dpudatarequest@utah.gov</p>
<p>UTAH ASSOCIATION OF ENERGY USERS Phillip J. Russell prussell@hjdllaw.com</p>	<p>UTAH CLEAN ENERGY hunter@utahcleanenergy.org kate@utahcleanenergy.org sarah@utahcleanenergy.org</p>
<p>OFFICE OF CONSUMER SERVICES Michele Beck mbeck@utah.gov Alyson Anderson akanderson@utah.gov Bela Vastag bvastag@utah.gov Alex Ware aware@utah.gov ocs@utah.gov</p>	<p>WESTERN RESOURCE ADVOCATES Sophie Hayes sophie.hayes@westernresources.org Nancy Kelly Nancy.kelly@westernresource.org Callie Hood Callie.hood@westernresources.org</p>

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/s/ Lisa Tormoen Hickey
Lisa Tormoen Hickey