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INTERWEST ENERGY ALLIANCE
Christopher Leger, CO #42013, WY #6-3963, DC #499541
3433 Ranch View Dr.
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Telephone: 307-421-3300
E-mail: chris@interwest.org

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, **Christopher Leger**, licensed in Colorado, the District of Columbia, and Wyoming (at times, “Counsel”), asks that he 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 hired on a full-time basis the undersigned attorney 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 a full-time employee of Interwest as well as an attorney licensed in Colorado, the District of Columbia, and Wyoming. A certificate of good standing from Colorado is attached as **Exhibit A**, a certificate of good standing from the District of Columbia is attached as **Exhibit B**, and a certificate of good standing from Wyoming is attached as **Exhibit C**. 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. Counsel regularly collaborates with other regulatory counsel in Utah and other jurisdictions. 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, Interwest requests permission to be represented by the undersigned Counsel to be admitted for this purpose as counsel of record in this proceeding.
- E. 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	Chris Leger Interwest Energy Alliance 3433 Ranch View Dr. Cheyenne, WY 82001 chris@interwest.org 307.421.3300
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Respectfully submitted this 26th day of October, 2021.

INTERWEST ENERGY ALLIANCE

By: /s/ Christopher Leger

Christopher Leger, CO #42013, WY #6-3963, DC #499541
 3433 Ranch View Dr.
 Cheyenne, WY 82001
 Telephone: 307-421-3300
 E-mail: chris@interwest.org

On Behalf of Interwest Energy Alliance

**Attachments: Exhibit A, Certificate of Good Standing, Colorado
 Exhibit B, Certificate of Good Standing, District of Columbia
 Exhibit C, 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

Christopher Leger

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 May A.D. 2010 and that at the date hereof the said Christopher Leger 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

15th day of October A.D. 2021

Cheryl Stevens

Clerk

By

Mirya Sanchez

Deputy Clerk

EXHIBIT B



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that

Christopher W Leger

was duly qualified and admitted on May 11, 2007 as an attorney and counselor entitled to
practice before this Court, and is, on the date indicated below, a(n)
ACTIVE member in good standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on October
14, 2021.

Julio A. Castillo

JULIO A. CASTILLO
Clerk of the Court

Issued By: *[Signature]*
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.

EXHIBIT C

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:

Christopher Wayne Leger

was on the 31st day of October, 2005, 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 15th day of October, 2021.

Shawna Goetz, Clerk

Laura Mickey

by deputy

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 26th 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>

SIERRA CLUB Rose Monahan rose.monahan@sierraclub.org Ana Boyd ana.boyd@sierraclub.org	ATTORNEY GENERAL Steven Snarr stevensnarr@agutah.gov Robert Moore rmoore@agutah.gov Patricia Schmid pschmid@agutah.gov Justin Jetter jjetter@agutah.gov Victor Copeland vcopeland@agutah.gov
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/s/Christopher Leger
Christopher Leger