



*Yvonne R. Hogle*  
*Assistant General Counsel*  
*1407 West North Temple, Suite 320*  
*Salt Lake City, UT 84116*  
*801.220.4050*  
*801.220.3299 Fax*

October 3, 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. 17-035-39** – In the Matter of the Voluntary Request of Rocky Mountain Power for Approval of Resource Decision to Repower Wind Facilities

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 Adam Lowney.

Please feel free to call me at the number referenced above or Bob Lively at (801) 220-4052 if you have any questions.

Sincerely,

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

Yvonne R. Hogle  
Assistant General Counsel

Enclosures

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

Katherine McDowell  
Adam Lowney  
McDowell Rackner Gibson PC  
419 SW 11<sup>th</sup> Avenue, Suite 400  
Portland, Oregon 97232  
Telephone: (503) 595-3926  
E-mail: [katherine@mrg-law.com](mailto:katherine@mrg-law.com)  
E-mail: [adam@mrg-law.com](mailto:adam@mrg-law.com)

*Attorney for Rocky Mountain Power*

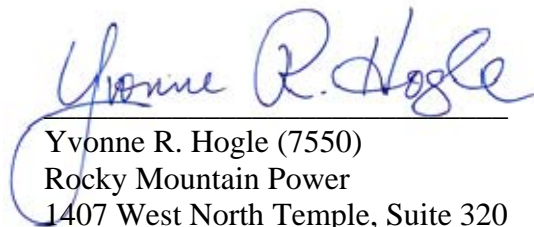
**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Voluntary Request of Rocky Mountain Power for Approval of Resource Decision to Repower Wind Facilities	Docket No. 17-035-39 <b>MOTION AND CONSENT OF SPONSORING LOCAL COUNSEL FOR PRO HAC VICE ADMISSION OF ADAM LOWNEY</b>
---	---

Pursuant to Rule 14-806 of the Utah Code of Judicial Administration, Yvonne R. Hogle, moves the Commission for an order admitting Adam Lowney *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 Adam Lowney, an attorney for McDowell Rackner Gibson PC, who is neither licensed to practice law in the State of Utah nor a resident of Utah. Mr. Lowney is admitted to practice in the State of Oregon where he 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 Mr. Lowney'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 Mr. Lowney 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 Mr. Lowney's pro hac vice admission application (**Exhibit B**), a copy of Mr. Lowney's certificate of good standing from the Oregon State Bar (**Exhibit C**), and a proposed Order admitting Mr. Lowney (**Exhibit D**).

DATED this 3<sup>rd</sup> day of October, 2017.

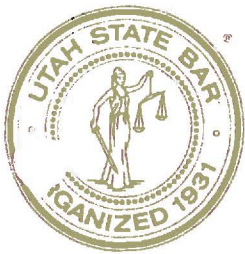


Yvonne R. Hogle (7550)  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, UT 84116  
Telephone: (801) 220-4050  
Fax: (801) 220-3299  
[yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)

*Attorney for Rocky Mountain Power*

**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

**Robert O. Rice**  
President  
Ray Quinney & Nebeker  
Salt Lake City

**John R. Lund**  
President-elect  
Parsons Behle & Latimer  
Salt Lake City

**S. Grace Acosta**  
Scalley Reading Bates Hansen &  
Rasmussen  
Salt Lake City

**John W. Bradley**  
Utah Attorney General's Office  
Ogden

**Steven R. Burt, AIA**  
Public Member  
Entelen Design Build  
Salt Lake City

**H. Jackson Burton**  
TraskBritt  
Salt Lake City

**Kate A. Conyers**  
Salt Lake Legal Defenders Assoc.  
Salt Lake City

**Heather M. Farnsworth**  
Match & Farnsworth  
Salt Lake City

**Mary Kay Griffin, CPA**  
Public Member  
Mayer Hoffman McCann  
Salt Lake City

**Llisa A. Hancock**  
Jeffs & Jeffs  
Provo

**Michelle Mumford**  
Attorney at Law  
Salt Lake City

**Herm Olsen**  
Hillyard Anderson & Olsen  
Logan

**Cara M. Tangaro**  
Tangaro Law Firm  
Salt Lake City

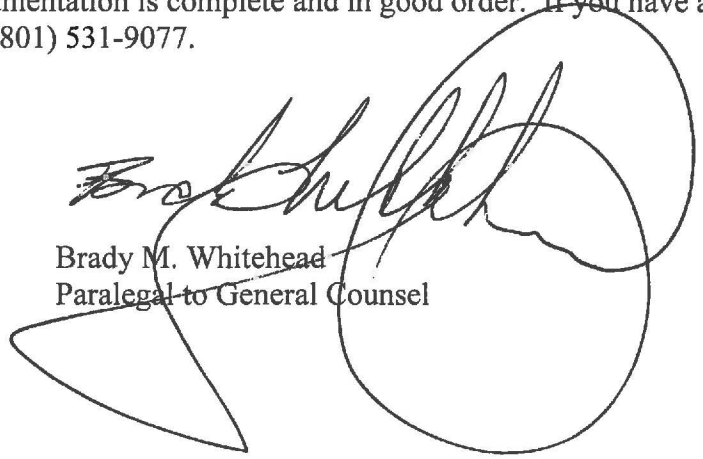
**Richard L. Thuet**  
Christensen & Jensen  
Salt Lake City

**Kristin K. Woods**  
Barney McKenna & Olmstead  
St. George

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

**Date Issued:** July 31, 2017  
**Case Name:** In The Matter of the Voluntary Request of Rocky Mountain Power for Approval of Resource Decision to Repower Wind Facilities Before The Public Service Commission of Utah  
**Case Number:** 17-035-39

This letter serves as an acknowledgement that the \$250.00 pro hac vice filing fee for **ADAM LOWNEY** 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 B**

APPLICATION FOR ADMISSION PRO HAC VICE

# 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:**

Adam Lowney

**Firm Name:**

McDowell Rackner Gibson PC

**Address:**

419 SW 11<sup>th</sup> Avenue, Suite 400

**City, State, Zip:**

Portland

OR

97205

**Telephone / Fax:**

503-595-3926

503-595-3928

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

adam@mrg-law.com

**State(s) to Which Admitted**

**Bar Number**

Oregon

053124

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

**Case Name**

Request of RMP Application for Approval of Resource Decision to Repower Wind Facilities

**Court**

Public Service Commission of Utah

**Case Number**

17-035-39

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

Rocky Mountain Power

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**

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

No

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?

No

If yes, please explain: \_\_\_\_\_

Are you (the Applicant) the subject of any pending disciplinary proceedings by any state's or court's bar organization?  No

**Sponsoring Local Counsel: (must be a Utah resident)**

**Name:** \_\_\_\_\_ Yvonne R. Hogle

**Firm Name:** \_\_\_\_\_ Rocky Mountain Power

**Utah Bar Number:** \_\_\_\_\_ 7550

**Address:** \_\_\_\_\_ 1407 West North Temple, Suite 320

**City, State, Zip:** \_\_\_\_\_ Salt Lake City, UT 84116

**Telephone / Fax:** \_\_\_\_\_ 801-220-4050 \_\_\_\_\_ 801-220-3299

**E-mail (if any):** \_\_\_\_\_ Yvonne.hogle@pacificorp.com

**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 10<sup>th</sup> day of July, 2007.

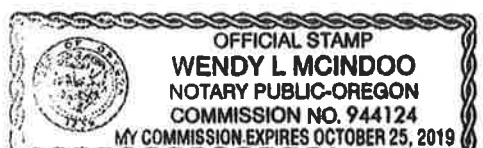
Applicant's Signature: \_\_\_\_\_ Adam Lowey

STATE OF Oregon )  
:SS  
COUNTY OF Multnomah

Signed and sworn to before me on the 10<sup>th</sup> day of July, 2007  
by Adam Lowey  
(Name of Applicant)

Wendy L. McIndoo  
Notary Public  
Residing at: Newberg, OR

My Commission Expires:  
10/25/2019





**EXHIBIT C**

**CERTIFICATE OF GOOD STANDING FROM THE OREGON STATE BAR**

## Certificate

State of Oregon            )  
                                      ) ss.  
County of Washington    )

I, Angela W. Bennett, 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:

**ADAM LOWNEY**

was admitted to practice law in the State of Oregon by examination and became an active member of the Oregon State Bar on September 22, 2005.

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.

Mr. Lowney 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 23<sup>rd</sup> day of June, 2017.



Angela W. Bennett  
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  
E-mail: [Robert.Richards@pacificorp.com](mailto:Robert.Richards@pacificorp.com)  
E-mail: [Yvonne.Hogle@pacificorp.com](mailto:Yvonne.Hogle@pacificorp.com)

Katherine McDowell  
Adam Lowney  
McDowell Rackner Gibson PC  
419 SW 11<sup>th</sup> Avenue, Suite 400  
Portland, Oregon 97232  
Telephone: (503) 595-3926  
E-mail: [katherine@mrg-law.com](mailto:katherine@mrg-law.com)  
E-mail: [adam@mrg-law.com](mailto:adam@mrg-law.com)

*Attorney for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Voluntary Request of Rocky Mountain Power for Approval of Resource Decision to Repower Wind Facilities	Docket No. 17-035-39  <b>[PROPOSED] ORDER GRANTING PRO HAC VICE ADMISSION OF ADAM LOWNEY</b>
---	--

Based on the motion for admission *pro hac vice* of Adam Lowney, the consent of sponsoring local counsel Yvonne R. Hogle, and a finding by the Commission that admission *pro hac vice* of Mr. Lowney will serve the interests of the parties and the efficient and just administration of the docket, it is hereby ordered that Mr. Lowney be admitted *pro hac vice* as counsel for PacifiCorp in the above-referenced docket.

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

\_\_\_\_\_  
Commission

\_\_\_\_\_  
Commission

\_\_\_\_\_  
Commission

Attest:

\_\_\_\_\_  
Commission Secretary

## **CERTIFICATE OF SERVICE**

Docket No. 17-035-39

I CERTIFY that on the \_\_\_ day of \_\_\_\_\_, 2017, a true and correct copy of the foregoing was served by electronic mail upon the following:

### **Utah Office of Consumer Services**

Cheryl Murray – [cmurray@utah.gov](mailto:cmurray@utah.gov)

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

### **Division of Public Utilities**

Erika Tedder – [etedder@utah.gov](mailto:etedder@utah.gov)

### **Assistant Attorney General**

Patricia Schmid – [pschmid@agutah.gov](mailto:pschmid@agutah.gov)

Justin Jetter – [jjetter@agutah.gov](mailto:jjetter@agutah.gov)

Robert Moore – [rmoore@agutah.gov](mailto:rmoore@agutah.gov)

Steven Snarr – [stevensnarr@agutah.gov](mailto:stevensnarr@agutah.gov)

### **Rocky Mountain Power**

Robert C. Lively – [bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com)

Yvonne Hogle – [yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)

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

### *McDowell Rackner Gibson PC*

Katherine McDowell – [katherine@mrg-law.com](mailto:katherine@mrg-law.com)

Adam Lowney – [adam@mrg-law.com](mailto:adam@mrg-law.com)

### **Pacific Power**

Sarah K. Link – [sarah.link@pacificorp.com](mailto:sarah.link@pacificorp.com)

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

### **Utah Association of Energy Users**

#### *Hatch, James & Dodge, P.C.*

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

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

### **Nucor Steel-Utah**

#### *Stone Mattheis Xenopoulous & Brew, P.C.*

Peter J. Mattheis – [pjm@smxblaw.com](mailto:pjm@smxblaw.com)

Eric J. Lacey – [ejl@smxblaw.com](mailto:ejl@smxblaw.com)

### *Cohne Kinghorn*

Jeremy R. Cook – [jcook@cohnekinghorn.com](mailto:jcook@cohnekinghorn.com)

**Interwest Energy Alliance**

*Manning Curtis Bradshaw & Bednar PLLC*

Mitch M. Lonson – [mlongson@mc2b.com](mailto:mlongson@mc2b.com)

*Tormoen Hickey LLC*

Lisa Tormoen Hickey – [lisahickey@newlawgroup.com](mailto:lisahickey@newlawgroup.com)

**Utah Clean Energy**

Sophie Hayes – [sophie@utahcleanenergy.org](mailto:sophie@utahcleanenergy.org)

Kate Bowman – [kate@utahcleanenergy.org](mailto:kate@utahcleanenergy.org)

**Western Resource Advocates**

Jennifer E. Gardner – [jennifer.gardner@westernresources.org](mailto:jennifer.gardner@westernresources.org)

Nancy Kelly – [nkelly@westernresources.org](mailto:nkelly@westernresources.org)

Penny Anderson – [penny.anderson@westernresources.org](mailto:penny.anderson@westernresources.org)

---

Administrative Assistant

**CERTIFICATE OF SERVICE**

Docket No. 17-035-39

I hereby certify that on October 3, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Cheryl Murray – [cmurray@utah.gov](mailto:cmurray@utah.gov)

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

**Division of Public Utilities**

Erika Tedder – [etedder@utah.gov](mailto:etedder@utah.gov)

**Assistant Attorney General**

Patricia Schmid – [pschmid@agutah.gov](mailto:pschmid@agutah.gov)

Justin Jetter – [jjetter@agutah.gov](mailto:jjetter@agutah.gov)

Robert Moore – [rmoore@agutah.gov](mailto:rmoore@agutah.gov)

Steven Snarr – [stevensnarr@agutah.gov](mailto:stevensnarr@agutah.gov)

**Rocky Mountain Power**

Robert C. Lively – [bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com)

Yvonne Hogle – [yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)

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

*McDowell Rackner Gibson PC*

Katherine McDowell – [katherine@mrg-law.com](mailto:katherine@mrg-law.com)

Adam Lowney – [adam@mrg-law.com](mailto:adam@mrg-law.com)

**Pacific Power**

Sarah K. Link – [sarah.link@pacificorp.com](mailto:sarah.link@pacificorp.com)

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

**Utah Association of Energy Users**

*Hatch, James & Dodge, P.C.*

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

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

**Nucor Steel-Utah**

*Stone Mattheis Xenopoulous & Brew, P.C.*

Peter J. Mattheis – [pjm@smxblaw.com](mailto:pjm@smxblaw.com)

Eric J. Lacey – [ejl@smxblaw.com](mailto:ejl@smxblaw.com)

*Cohne Kinghorn*

Jeremy R. Cook – [jcook@cohnekinghorn.com](mailto:jcook@cohnekinghorn.com)



**Interwest Energy Alliance**

*Manning Curtis Bradshaw & Bednar PLLC*

Mitch M. Lonson – [mlongson@mc2b.com](mailto:mlongson@mc2b.com)

*Tormoen Hickey LLC*

Lisa Tormoen Hickey – [lisahickey@newlawgroup.com](mailto:lisahickey@newlawgroup.com)

**Utah Clean Energy**

Sophie Hayes – [sophie@utahcleanenergy.org](mailto:sophie@utahcleanenergy.org)

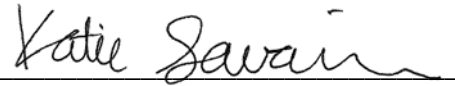
Kate Bowman – [kate@utahcleanenergy.org](mailto:kate@utahcleanenergy.org)

**Western Resource Advocates**

Jennifer E. Gardner – [jennifer.gardner@westernresources.org](mailto:jennifer.gardner@westernresources.org)

Nancy Kelly – [nkelly@westernresources.org](mailto:nkelly@westernresources.org)

Penny Anderson – [penny.anderson@westernresources.org](mailto:penny.anderson@westernresources.org)



Katie Savarin  
Coordinator, Regulatory Operations