

**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON**

In the Matter of	)	Docket No. UE 267
PacifiCorp, dba Pacific Power	)	
	)	MOTION TO APPEAR
	)	PRO HAC VICE
Transition Adjustment, Five-Year Cost of Service	)	
Opt-Out	)	

In accordance with OAR 860-001-0320 and UTCR 3.170, the undersigned attorney, a member in good standing of the District of Columbia Bar, files this motion to appear pro hac vice in the above-referenced proceeding. In support of this motion, the undersigned attorney states as follows:

The undersigned requests permission to appear pro hac vice in this proceeding to represent COMPETE Coalition, which is filing a Petition to Intervene and Comments on this date in this proceeding. In compliance with OAR 860-001-0320(2), the undersigned provides the following information:

1. A certificate of compliance for pro hac vice admission (Attachment A)
2. A certificate of good standing from the District of Columbia Bar (Attachment B)
3. Because the undersigned attorney's appearance before the Commission constitutes the "private practice of law," a certificate of insurance covering the attorney's activities in this State and providing professional liability insurance (Attachment C)

In compliance with OAR 860-001-0320(3), the undersigned has associated with a member in good standing of the Oregon State Bar who intends to participate meaningfully in this matter. The member in good standing of the Oregon State Bar is:

Irion Sanger                      Oregon Bar Number 003750  
Attorney at Law  
Sanger Law PC  
1117 SE 53rd Ave  
Portland, OR 97215

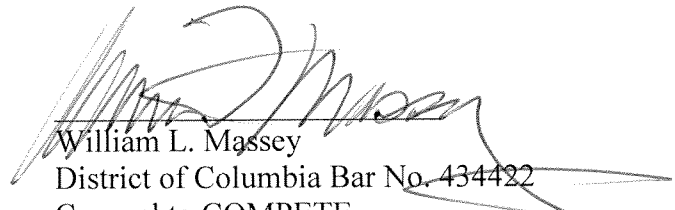
503-756-7533 (tel)  
503-334-2235 (fax)  
[irion@sanger-law.com](mailto:irion@sanger-law.com)

In accordance with UTCR 3.170(1)(b), the undersigned certifies that he is not subject to pending disciplinary proceedings in any other jurisdiction. In accordance with UTCR 3.170(1)(d), the undersigned certifies that he will: comply with applicable statutes, laws, and procedural rules of the state of Oregon; be familiar with and comply with the disciplinary rules of the Oregon State Bar; and submit to the jurisdiction of the Oregon courts and the Oregon State Bar with respect to acts and omissions occurring during the undersigned attorney's admission under this rule.

Finally, in accordance with UTCR 3.170(1)(f), the undersigned agrees to notify this Commission promptly of any changes in the undersigned's insurance or status.

Based on the foregoing, the undersigned respectfully requests that the Commission grant this motion to appear pro hac vice in this proceeding.

Respectfully submitted,



William L. Massey  
District of Columbia Bar No. 434422  
Counsel to COMPETE  
Covington & Burling LLP  
1201 Pennsylvania Avenue, N.W.  
Washington, DC 20004  
202-662-5322  
wmassey@cov.com

Date: June 17, 2014

# ATTACHMENT

A

In re: William L. Massey  
Name of Out-of-State Attorney

## Certificate of Compliance For Pro Hac Vice Admission

I, William L. Massey (print name), am an attorney in the State of District of Columbia and I intend to seek *pro hac vice* admission in accordance with ORS 9.241 and UTCR 3.170 in the following Oregon court action or proceeding:

Case Name: In the matter of PacifiCorp, dba Pacific Power  
Court: Oregon Public Utility Commission Case No.: UE-267

I certify that (check all that apply):

- I am an attorney in good standing in the State of District of Columbia, as evidenced by the attached good standing certificate issued by the licensing authority in that state.
- I am not subject to any pending disciplinary proceedings in any jurisdiction; or
- I am subject to pending disciplinary proceedings in another jurisdiction, the nature and status of which are described in an attachment to this certificate.
- I intend to associate in the above-referenced action or proceeding with Irion Sanger, OSB No. 003750, an active member in good standing of the Oregon State Bar, who will participate meaningfully in the matter.
- I will comply with applicable statutes, laws, and procedural rules of the State of Oregon; be familiar with and comply with disciplinary rules of the Oregon State Bar; and submit to the jurisdiction of the Oregon courts and Oregon State Bar with respect to acts and omissions occurring during my *pro hac vice* admission.
- My private law practice activities in Oregon are covered by professional liability insurance substantially equivalent to the Oregon State Bar Professional Liability Fund plan, as evidenced by the attached certificate of insurance coverage.
- I agree, as a continuing obligation of *pro hac vice* admission, to notify the trial court promptly of any changes in my insurance coverage, or my admission or disciplinary status in any other jurisdiction.
- I will provide to the Oregon State Bar a copy of the order admitting me *pro hac vice* in the above-referenced matter when such an order is granted. In the event *pro hac vice* admission is revoked for any reason, I will promptly notify the Oregon State Bar.
- I submit \$250 to the Oregon State Bar as payment of the *pro hac vice* fee established by ORS 9.241 and the rules of the Oregon Supreme Court. I acknowledge that this fee is for a period of twelve months from the date of the Acknowledgment of Receipt issued below, and that an additional fee of \$250 will be required in order for me to continue my *pro hac vice* admission in the matter for every twelve-month period thereafter.

Dated this 4th day of June, 2014.

**X**

(Applicant Signature)

Mailing Address: Covington & Burling LLP  
1201 Pennsylvania Avenue, NW  
Washington, DC 20004

District of Columbia Bar No.: 434422

(Home Jurisdiction)

Phone: 202-662-5322

FAX: 202-778-5322

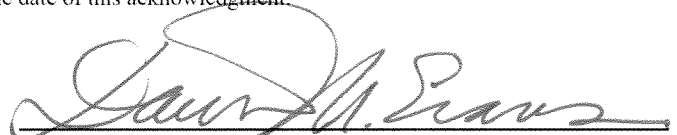
Email: wmassey@cov.com

### Acknowledgment of Receipt

As Regulatory Services Counsel of the Oregon State Bar, I acknowledge receipt from the above-named out-of-state attorney of the Certificate of Compliance for Pro Hac Vice Admission and attachments, and the \$250 fee for pro hac vice appearance in the above-referenced Oregon action or proceeding. The fee is for a period of twelve months from the date of this acknowledgment.

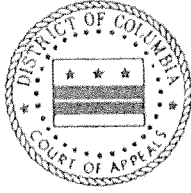
Dated this 10<sup>th</sup> day of June, 2014.

SEE MATERIALS ATTACHED:

  
Regulatory Services Counsel

# **ATTACHMENT**

**B**



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

**WILLIAM L. MASSEY**

*was on **OCTOBER 5, 1992** duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an 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 **May 22, 2014**.*

JULIO A. CASTILLO  
Clerk of the Court

By: *Brenda K. Hancock*  
Deputy Clerk

# **ATTACHMENT**

**C**



ALAS  
Attorneys'  
Liability  
Assurance  
Society, Inc.

May 22, 2014

Oregon State Bar  
Regulatory Services  
P.O. Box 231935  
Tigard, OR 97281-1935

To Whom It May Concern:

**CONFIRMATION OF INSURANCE**

We hereby confirm that Covington & Burling LLP and William L. Massey have Professional Liability Coverage under Policy ALA#1009 with limits of liability in excess of the Oregon State Bar Professional Liability Fund Plan.

The Policy effective date is from January 1, 2014 to January 1, 2015.

The Policy covers professional services rendered in the state of Oregon.

Such Policy is subject to the terms, conditions, limitations and exclusions stated therein.

**ATTORNEYS' LIABILITY ASSURANCE SOCIETY, INC.,  
A RISK RETENTION GROUP**

By: Nancy J. Montroy  
Nancy J. Montroy  
Vice President – Director of Underwriting

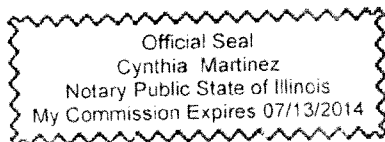
Date: 5/22/2014

State of Illinois  
County of Cook

Signed and sworn (or affirmed) to before me on May 22, 2014 by Nancy J. Montroy as an Officer of Attorneys' Liability Assurance Society, Inc., A Risk Retention Group.

Cynthia Martinez  
(Signature of Notary Public)

(Seal)



311 S. Wacker Drive, Suite 5700  
Chicago, IL 60606-6629  
tel 312.697.6900  
fax 312.697.6901

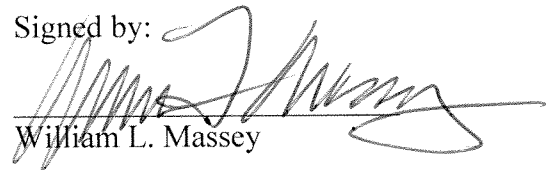


**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused MOTION TO APPEAR PRO HAC VICE to be served by electronic mail to those parties whose email addresses appear on the attached service list from OPUC Docket No. UE 267.

Dated at Washington, DC, this 17th day of June, 2014.

Signed by:



William L. Massey



**eDockets**

Docket Summary

[Return to Search Page](#)

[eFiling](#)

**Docket No:** UE 267    **Docket Name:** PACIFIC POWER

[Print Summary](#)

**Subject Company:** [PACIFIC POWER](#)

In the Matter of PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year Cost of Service Opt-Out. Filed by William R. Griffith. Hard copy rec'd 2/28/13. (See initial utility filing for electronic version.)

**Filing Date:** 2/28/2013

**Advice No:** 13-004

**Effective:** 1/1/2015

**Expiration:** 12/31/2014

**Status:** **SUSPENDED**

**Case Manager:** MARC HELLMAN

**Phone:** (503) 378-6355

**Email:** [marc.hellman@state.or.us](mailto:marc.hellman@state.or.us)

**Law Judge:** TRACI KIRKPATRICK

**Phone:** (503) 378-6683

[Email Service List \(semi-colon delimited\)](#)    [Email Service List \(comma delimited\)](#)

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[Service List Popup \(semi-colon delimited\)](#)    [Service List Popup \(comma delimited\)](#)

[General information about Tariff Filings.](#)

<u>ACTIONS</u>		<u>SERVICE LIST (Parties)</u>	<u>SCHEDULE</u>
<b>W=Waive Paper service</b>	<b>C=Confidential HC=Highly Confidential</b>	<u>Sort by Last Name</u>	<u>Sort by Company Name</u>
<b>W</b>	CARL FINK	628 SW CHESTNUT ST, STE 200 PORTLAND OR 97219 cmfink@blueplanetlaw.com	
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<b>W</b>	<b>CABLE HUSTON BENEDICT HAAGENSEN &amp; LLOYD LLP</b>  RICHARD LORENZ (C)	1001 SW FIFTH AVE - STE 2000 PORTLAND OR 97204-1136 rlorenz@cablehuston.com	
<b>W</b>	<b>CONSTELLATION ENERGY</b>		

	<b>COMMODITIES GROUP, INC.</b>	
	MARY LYNCH	5074 NAWAL DRIVE EL DORADO HILLS CA 95762 mary.lynch@constellation.com
<b>W</b>	<b>CONSTELLATION NEWENERGY, INC.</b>	
	JOHN DOMAGALSKI	550 WEST WASHINGTON BLVD, STE 300 CHICAGO IL 60661 john.domagalski@constellation.com
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		PORTLAND OR 97204 brmullins@mwanalytics.com
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	JAY TINKER	121 SW SALMON ST 1WTC-0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com
<b>W</b>	<b>PUBLIC UTILITY COMMISSION OF OREGON</b>	
	MARC HELLMAN <b>(C)</b>	PO BOX 1088 SALEM OR 97308-1088 marc.hellman@state.or.us
<b>W</b>	<b>PUC STAFF - DEPARTMENT OF JUSTICE</b>	
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	GEORGE WAIDELICH	5918 STONERIDGE MALL RD PLEASANTON OR 94588-3229

george.waidelich@safeway.com

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**W WALMART STORES INC**

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