

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of the Application of Hydro)
One Limited (acting through its indirect)
Subsidiary Olympus Equity LLC) for an)
Order Authorizing Hydro One Limited To)
Exercise Substantial Influence Over the)
Policies and Actions of Avista Corporation)
_____)

Case No. UM-1897

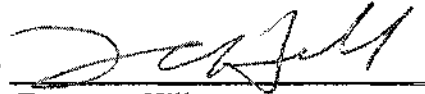
MOTION TO ADMIT COUNSEL *PRO*
HAC VICE

Pursuant to OAR 860-001-0320 and UTCR 3.170, Hydro One Limited moves to admit Elizabeth Thomas, a member in good standing of the Washington State Bar, as counsel *pro hac vice* in the proceedings before the Oregon Public Utility Commission in this docket.

In support of this motion, Hydro One Limited has attached the affidavit of Elizabeth Thomas.

Dated this 28 day of September 2017.

By



Teresa A. Hill

OSB No. 146114

K&L Gates LLP

Attorneys for Hydro One Limited

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of the Application of Hydro)
One Limited (acting through its indirect)
Subsidiary Olympus Equity LLC) for an)
Order Authorizing Hydro One Limited To)
Exercise Substantial Influence Over the)
Policies and Actions of Avista Corporation)
_____)

Case No. UM-1897

AFFIDAVIT OF ELIZABETH THOMAS
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE*

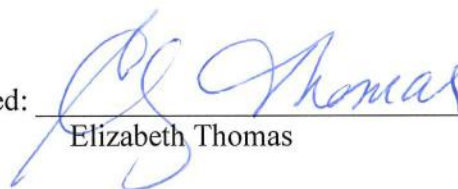
I, Elizabeth Thomas, being first duly sworn an oath, depose and say:

1. My full name is Elizabeth Thomas.
2. I am admitted to practice law in the state of Washington and am an attorney in good standing in that jurisdiction. Attached to this Affidavit is a true and correct copy of a certificate showing that I am an attorney in good standing in Washington. I am not subject to any pending disciplinary proceedings in Washington.
3. In this matter, I will associate with Teresa A. Hill, Oregon State Bar No. 146114, who, to the best of my knowledge, is an active member in good standing of the Oregon State Bar. In accordance with UTCR 3.170, Teresa A. Hill will participate meaningfully in this docket.
4. I will comply with applicable statutes, laws, and procedural rules of the State of Oregon. I will be familiar with and comply with the Oregon Rules of Professional Conduct. I will submit to the jurisdiction of the Oregon courts and the Oregon State Bar with respect to acts and omissions occurring during my *pro hac vice* admission in this proceeding.
5. I have attached, as Attachment 2, a certificate of insurance covering my activities in Oregon and providing professional liability insurance substantially equivalent to the Oregon State Bar Professional Liability Fund plan. Although my name does not appear

on the attached certificate of insurance, I am an employee of K&L Gates LLP and am covered by the firm's policy set forth on the attached certificate of insurance. I agree, as a continuing obligation under UTCR 3.170, to notify the Oregon Public Utility Commission promptly of any changes in my insurance or status.


I declare under penalty of perjury under the laws of the state of Oregon that the foregoing is true and correct based on my information and belief.

Signed this 14th day of September 2017 at Seattle, WA.

Signed: 
Elizabeth Thomas

SUBSCRIBED AND SWORN to before this 14th day of September 2017.




Notary Public for Washington
Residing at: KENMORE, WA
My commission expires: 6-8-21

Notary Stamp

Attachment 1
Certificate of Good Standing

RECEIVED
SEP 22 2017

In re: Application of Hydro One Limited
Elizabeth Thomas

**Certificate of Compliance
For Pro Hac Vice Admission**

I, Elizabeth Thomas (print name), am an attorney in the State of Washington
and I intend to seek *pro hac vice* admission in accordance with ORS 9.241 and UCR 3.170 in the following Oregon court action or proceeding:
In the Matter of the Application of Hydro One Limited (acting through its indirect subsidiary Olympus Equity LLC) for an Order Authorizing Hydro One Limited To Exercise
Case Name: Substantial Influence Over the Policies and Actions of Avista Corporation
Court: Oregon Public Utility Commission **Case No.:** UM 1897

I certify that (check all that apply):

- I am an attorney in good standing in the State of Washington, 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 Teresa A. Hill, OSB No. 146114, 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 \$500 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 \$500 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 14th day of September, 20 17.

X Elizabeth Thomas
(Applicant Signature)

Washington Bar No.: 11544
(Home Jurisdiction)

Mailing Address: K&L Gates LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158

Phone: 1 (206) 623-7580
FAX: 1 (206) 623-7022
Email: liz.thomas@klgates.com

Acknowledgment of Receipt

As Director of Regulatory Services 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 \$500 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 22nd day of September, 20 17.

SEE MATERIALS ATTACHED:

Dawn Evans
Dawn Evans, Director of Regulatory Services

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 11544
)	
OF)	CERTIFICATE
)	
ELIZABETH THOMAS)	OF
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	GOOD STANDING
)	

I, Susan L. Carlson, Clerk of the Supreme Court of the State of Washington, hereby certify

ELIZABETH THOMAS

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on May 11, 1981, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 23rd day of August, 2017.

A handwritten signature in black ink, appearing to read "Susan L. Carlson", written over a horizontal line.

Susan L. Carlson
Supreme Court Clerk
Washington State Supreme Court



ALAS
Attorneys'
Liability
Assurance
Society, Inc.

December 15, 2016

K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

To Whom It May Concern:

CONFIRMATION OF INSURANCE

We hereby confirm that K&L Gates LLP has Professional Liability Coverage under Policy ALA#1085 with an annual limit of \$50,000,000 per claim and \$100,000,000 in the aggregate with the right, under stated conditions, to purchase extended reporting rights upon termination of such Policy by ALAS.

The self-insured retention under such Policy is \$3,000,000 each claim up to an aggregate of \$6,000,000 and \$100,000 each claim thereafter.

The Policy effective date is from January 1, 2017 to January 1, 2018.

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

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

By: Nancy Montroy Date: 12/15/2016

Nancy J. Montroy
Vice President - Director of Underwriting

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

alas.com

Attachment 2

Certificate of Insurance



December 15, 2016

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K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

To Whom It May Concern:

CONFIRMATION OF INSURANCE

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

By: *Nancy J. Montroy*
Nancy J. Montroy
Vice President - Director of Underwriting

Date: 12/15/2016

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



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PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of the Application of Hydro)
One Limited (acting through its indirect)
Subsidiary Olympus Equity LLC) for an)
Order Authorizing Hydro One Limited To)
Exercise Substantial Influence Over the)
Policies and Actions of Avista Corporation)
_____)

Case No. UM-1897

MOTION TO ADMIT COUNSEL *PRO*
HAC VICE

Pursuant to OAR 860-001-0320 and UTCR 3.170, Hydro One Limited moves to admit Kari Vander Stoep, a member in good standing of the Washington State Bar, as counsel *pro hac vice* in the proceedings before the Oregon Public Utility Commission in this docket.

In support of this motion, Hydro One Limited has attached the affidavit of Kari Vander Stoep.

Dated this 28 day of September 2017.

By



Teresa A. Hill

OSB No. 146114

K&L Gates LLP

Attorneys for Hydro One Limited

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of the Application of Hydro)
One Limited (acting through its indirect)
Subsidiary Olympus Equity LLC) for an)
Order Authorizing Hydro One Limited To)
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Policies and Actions of Avista Corporation)
_____)

Case No. UM-1897

AFFIDAVIT OF KARI VANDER STOEP
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE*

I, Kari Vander Stoep, being first duly sworn an oath, depose and say:

1. My full name is Kari Vander Stoep.
2. I am admitted to practice law in the state of Washington and am an attorney in good standing in that jurisdiction. Attached to this Affidavit is a true and correct copy of a certificate showing that I am an attorney in good standing in Washington. I am not subject to any pending disciplinary proceedings in Washington.
3. In this matter, I will associate with Teresa A. Hill, Oregon State Bar No. 146114, who, to the best of my knowledge, is an active member in good standing of the Oregon State Bar. In accordance with UTCR 3.170, Teresa A. Hill will participate meaningfully in this docket.
4. I will comply with applicable statutes, laws, and procedural rules of the State of Oregon. I will be familiar with and comply with the Oregon Rules of Professional Conduct. I will submit to the jurisdiction of the Oregon courts and the Oregon State Bar with respect to acts and omissions occurring during my *pro hac vice* admission in this proceeding.
5. I have attached, as Attachment 2, a certificate of insurance covering my activities in Oregon and providing professional liability insurance substantially equivalent to the Oregon State Bar Professional Liability Fund plan. Although my name does not appear

on the attached certificate of insurance, I am an employee of K&L Gates LLP and am covered by the firm's policy set forth on the attached certificate of insurance. I agree, as a continuing obligation under UTCR 3.170, to notify the Oregon Public Utility Commission promptly of any changes in my insurance or status.

I declare under penalty of perjury under the laws of the state of Oregon that the foregoing is true and correct based on my information and belief.

Signed this 14th day of September 2017 at Seattle, WA.

Signed: Kari Vander Stoep
Kari Vander Stoep

SUBSCRIBED AND SWORN to before this 14th day of September 2017.



Joyce A Hamack
Notary Public for Washington
Residing at: KENMORE, WA
My commission expires: 6-8-21

Notary Stamp

Attachment 1

Certificate of Good Standing

RECEIVED
SEP 22 2017
REGULATORY SERVICES

In re: Application of Hydro One Limited
Kari Vander Stoep

**Certificate of Compliance
For Pro Hac Vice Admission**

I, Kari Vander Stoep (print name), am an attorney in the State of Washington
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:
In the Matter of the Application of Hydro One Limited (acting through its indirect subsidiary Olympus Equity LLC) for an Order Authorizing Hydro One Limited To Exercise
Case Name: Substantial Influence Over the Policies and Actions of Avista Corporation

Court: Oregon Public Utility Commission **Case No.:** UM 1897

I certify that (check all that apply):

- I am an attorney in good standing in the State of Washington, 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 Teresa A. Hill, OSB No. 146114, 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.
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Dated this _____ day of September, 20 17.

X Kari Vander Stoep
(Applicant Signature)

Washington Bar No.: 35923
(Home Jurisdiction)

Mailing Address: K&L Gates LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158

Phone: 1 (206) 623-7580
FAX: 1 (206) 623-7022
Email: kari.vanderstoep@klgates.com

Acknowledgment of Receipt

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Dated this 22nd day of September, 20 17.

SEE MATERIALS ATTACHED:

Dawn Evans
Dawn Evans, Director of Regulatory Services

Note that the professional liability coverage deductible substantially exceeds that of the PLF.

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 35923
)	
OF)	CERTIFICATE
)	
KARI LEE VANDER STOEP)	OF
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	GOOD STANDING
)	


I, Susan L. Carlson, Clerk of the Supreme Court of the State of Washington, hereby certify

KARI LEE VANDER STOEP

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on December 3, 2004, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 23rd day of August, 2017.


Susan L. Carlson
Supreme Court Clerk
Washington State Supreme Court



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December 15, 2016

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The Policy effective date is from January 1, 2017 to January 1, 2018.

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

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

By: *Nancy Montroy* Date: 12/15/2016

Nancy J. Montroy
Vice President - Director of Underwriting

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By: *Nancy J. Montroy*
Nancy J. Montroy
Vice President - Director of Underwriting

Date: 12/15/2016

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