

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1707**

In the Matter of  
SIERRA CLUB,

Regarding violation of Protective Order No.  
13-095.

MOTION BY SIERRA CLUB FOR  
ANDREA ISSOD TO APPEAR  
PRO HAC VICE

In accordance with OAR 860-001-0320 and UTCR 3.170(1), Sierra Club hereby moves the Public Utility Commission of Oregon to admit Andrea Issod to appear *pro hac vice* on behalf of intervenor Sierra Club in the above captioned proceeding. Ms. Issod has associated with Kevin E. Parks, an attorney licensed to practice law and in good standing in the State of Oregon (Oregon Bar No. 096728) as co-counsel for this proceeding.

Attached hereto are (1) certificate of compliance for *pro hac vice* admission for Ms. Issod, and (1) certificate of the clerk of the Supreme Court of California indicating that Ms. Issod is admitted to practice law in California and is in good standing.

Ms. Issod is a full time employee of the Sierra Club, which is a non-profit corporation. UTCR 3.170(1) therefore does not require Ms. Issod to provide a certificate of professional liability insurance for admission *pro hac vice* because she will not be engaged in the private practice of law. UTCR 3.170(1)(e) ("If the attorney will engage in the private practice of law in this state provide a certificate of insurance covering the attorney's activities in this state and providing professional liability insurance substantially equivalent to the Oregon State Bar Professional Liability Fund plan."); ORS 9.08(2)(b) ("For purposes of paragraph (a) [establishing

authority to require professional liability insurance], an attorney is not engaged in the private practice of law if the attorney is a full-time employee of a corporation...")

WHEREFORE Sierra Club respectfully requests that the Commission grant admission *pro hac vice* to Andrea Issod for this proceeding.

Dated: October 7th, 2014

Respectfully submitted,

/s/ Kevin E. Parks

Kevin E. Parks  
Parks Law Offices, LLC  
310 SW 4<sup>th</sup> Ave., Ste. 806  
Portland, OR 97204  
(503) 308-1080 Phone  
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*Attorney for Sierra Club*



# Supreme Court of California

FRANK A. McGUIRE  
*Court Administrator and Clerk of the Supreme Court*

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT  
OF THE  
STATE OF CALIFORNIA**

**ANDREA S. ISSOD**

*I, FRANK A. McGUIRE, Clerk of the Supreme Court of the State of California, do hereby certify that ANDREA S. ISSOD was on the 1st day of June, 2004, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 30th day of September, 2014.*

FRANK A. McGUIRE

*Clerk of the Supreme Court*

By: \_\_\_\_\_

A handwritten signature in blue ink, appearing to read "Cahoon", written over a horizontal line.

*Charles Cahoon, Deputy Clerk*

In re: Andrea Issod  
Name of Out-of-State Attorney )

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

I, Andrea Issod (print name), am an attorney in the State of California  
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 SIERRA CLUB, Regarding violation of Protective Order No. 13-095.

Court: Public Utility Commission of Oregon Case No.: UM 1707

I certify that (check all that apply):

- I am an attorney in good standing in the State of California, 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 Kevin Parks, OSB No. 096728, 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 30th day of September, 20 14.

**X** Andrea Issod  
(Applicant Signature)

CA District 1 Bar No.: 230920  
(Home Jurisdiction)

Mailing Address: Andrea Issod, Sierra Club Environmental Law Program  
85 Second Street, 2nd Floor  
San Francisco, CA 94105

Phone: 415-977-5544  
FAX: 415-977-5793  
Email: andrea.issod@sierraclub.org

**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 \$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 2nd day of October, 20 14.

SEE MATERIALS ATTACHED:

Dawn M. Evans  
Regulatory Services Counsel

*vices, PO Box 231935, Tigard, OR 97281-1935*

Regarding out of state attorney's claimed exemption from the requirement to provide proof of professional liability insurance.

## CERTIFICATE OF SERVICE

I hereby certify that on the date below, I served the foregoing **MOTION BY SIERRA CLUB FOR ANDREA S. ISSOD TO APPEAR PRO HAC VICE** on the following parties via U.S. First Class mail, or by email where paper service has been waived:

<b>W=Waive Paper service</b>	<b>C=Confidential HC=Highly Confidential</b>	<a href="#"><u>Sort by Last Name</u></a>	<a href="#"><u>Sort by Company</u></a>
<b>W</b>	<b>CITIZENS' UTILITY BOARD OF OREGON</b>		
	OPUC DOCKETS	610 SW BROADWAY, PORTLAND OR dockets@oregoncub.org	STE 400 97205
	ROBERT JENKS (C)	610 SW BROADWAY, PORTLAND OR bob@oregoncub.org	STE 400 97205
	G. CATRIONA MCCRACKEN (C)	610 SW BROADWAY, PORTLAND OR catriona@oregoncub.org	STE 400 97205
<b>W</b>	<b>DAVISON VAN CLEVE</b>		
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<b>W</b>	<b>DAVISON VAN CLEVE PC</b>		
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<b>W</b>	<b>MOUNTAIN WEST ANALYTICS</b>		
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<b>W</b>	<b>NW ENERGY COALITION</b>		
	WENDY GERLITZ	1205 SE PORTLAND OR wendy@nwenerg.v.org	FLAVEL 97202
<b>W</b>	<b>PACIFIC POWER</b>		
	SARAH WALLACE (C)	825 NE MULTNOMAH ST	STE 1800

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sarah.wallace@pacificorp.com

**W PACIFICORP. DBA  
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**W PARKS LAW OFFICES.  
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**W PUC STAFF--  
DEPARTMENT OF  
JUSTICE**

JASON W JONES (C) BUSINESS ACTIVITIES SECTION  
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**W SIERRA CLUB LAW  
PROGRAM**

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**W TROUTMAN SANDERS**

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lisa.hardie@troutmansanders.com

Dated this 7th day of October, 2014

PARKS LAW OFFICES, LLC

By: /s/ Kevin E. Parks  
Kevin E. Parks, OSB # 096728  
*Of Attorney for Sierra Club*