

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1716

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation to Determine the Resource  
Value of Solar.

MOTION FOR ADMISSION  
PRO HAC VICE

Pursuant to UTCR 3.170, I, Joseph F. Wiedman move the Public Utility Commission of Oregon for an Order allowing my representation of The Alliance for Solar Choice (TASC) in the above captioned proceeding. This Motion is supported by the attached Affidavit of Joseph F. Wiedman, Certificate of Standing from the State Bar of California, and Certificate of Insurance.

Respectfully submitted this 27 day of April 2016.

/s/ Joseph F. Wiedman

Joseph F. Wiedman  
KEYES, FOX & WIEDMAN LLP  
436 14th Street, Suite 1305  
Oakland, CA 94612  
Telephone: (510) 788-2154  
Email: [jwiedman@kfwlaw.com](mailto:jwiedman@kfwlaw.com)

Counsel to the Alliance For Solar Choice

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1716

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON,

Investigation to Determine the Resource  
Value of Solar.

AFFIDAVIT OF JOSEPH F. WIEDMAN

Joseph F. Wiedman, being duly sworn, deposes and states that the following is true to his personal knowledge and belief.

1. Joseph F. Wiedman, counsel to The Alliance for Solar Choice (TASC), certifies that he is an attorney in good standing with the State Bar of California and that he is not subject to pending disciplinary proceedings in any other jurisdiction.
2. Joseph F. Wiedman will associate with Kevin T. Fox, an active member in good standing of the Oregon State Bar, who will participate meaningfully in this proceeding. Mr. Fox's contact information is as follows below and he should remain on the service list:

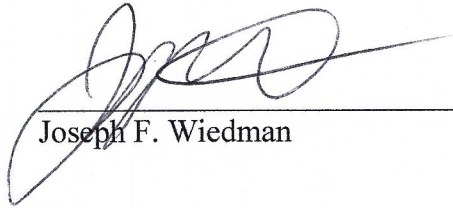
Kevin T. Fox, OR Bar No. 052551  
1580 Lincoln St. Suite 880  
Denver, CO 80203  
Telephone: 303-658-0010  
Email: [kfox@kfwlaw.com](mailto:kfox@kfwlaw.com)

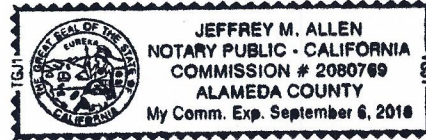
3. Joseph F. Wiedman will comply with all applicable statutes, law, and procedural rules of the state of Oregon; be familiar with and comply with the disciplinary ruled of the Oregon State Bar; and submit to the jurisdiction of the Oregon courts

and the Oregon State Bar with respect to acts and omissions occurring during his admission in this proceeding.

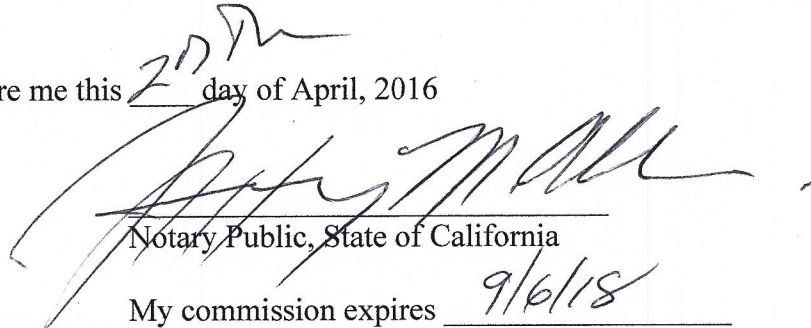
4. Joseph F. Wiedman will notify the Public Utility Commission of Oregon promptly of any changes in his insurance or status.

DATED this 27 day of April, 2016

  
\_\_\_\_\_  
Joseph F. Wiedman



Subscribed and sworn before me this 27th day of April, 2016

  
\_\_\_\_\_  
Notary Public, State of California  
My commission expires 9/6/18



# THE STATE BAR OF CALIFORNIA

MEMBER RECORDS & COMPLIANCE

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

April 15, 2016

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JOSEPH FRANCIS WIEDMAN, #234302 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2004; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner  
Custodian of Membership Records





KEYES-1

OP ID: AC

## CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

04/18/2016

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Ahern Insurance Brokerage 9655 Granite Ridge Dr., #500 San Diego, CA 92123 Susan B. Kilano	CONTACT NAME: Susan B. Kilano	
	PHONE (A/C, No, Ext): 858-571-9030	FAX (A/C, No): 858-571-9010
	E-MAIL ADDRESS: skilano@aherninsurance.com	
	INSURER(S) AFFORDING COVERAGE	NAIC #
	INSURER A: PSIC Insurance Co/Atty Shield	11127
	INSURER B:	
	INSURER C:	
	INSURER D:	
	INSURER E:	
	INSURER F:	

## COVERAGES

## CERTIFICATE NUMBER:

## REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	COMMERCIAL GENERAL LIABILITY						EACH OCCURRENCE \$
	<input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence) \$
							MED EXP (Any one person) \$
							PERSONAL & ADV INJURY \$
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE \$
	<input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC						PRODUCTS - COMP/OP AGG \$
	OTHER:						\$
	AUTOMOBILE LIABILITY						COMBINED SINGLE LIMIT (Ea accident) \$
	<input type="checkbox"/> ANY AUTO						BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS	<input type="checkbox"/> SCHEDULED AUTOS					BODILY INJURY (Per accident) \$
	<input type="checkbox"/> HIRED AUTOS	<input type="checkbox"/> NON-OWNED AUTOS					PROPERTY DAMAGE (Per accident) \$
							\$
	UMBRELLA LIAB	<input type="checkbox"/> OCCUR					EACH OCCURRENCE \$
	EXCESS LIAB	<input type="checkbox"/> CLAIMS-MADE					AGGREGATE \$
	DED <input type="checkbox"/> RETENTION \$						\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY	<input type="checkbox"/> Y <input type="checkbox"/> N					PER STATUTE <input type="checkbox"/> OTH-ER <input type="checkbox"/>
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)	<input type="checkbox"/> N/A					E.L. EACH ACCIDENT \$
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - EA EMPLOYEE \$
							E.L. DISEASE - POLICY LIMIT \$
A	Claims Made			LPL7039811	07/01/2015	07/01/2016	Per Claim 1,000,000
	Lawyers Prof Liab						Aggregate 2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Deductible: \$25,000 per claim

## CERTIFICATE HOLDER

FOR REF

FOR REFERENCE ONLY

## CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

*Susan B. Kilano*

© 1988-2014 ACORD CORPORATION. All rights reserved.

In re: Joseph F. Wiedman

Name of Out-of-State Attorney

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

I, Joseph F. Wiedman

(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:** Investigation to Determine the Resource Value of Solar

**Court:** Public Utility Commission of Oregon

**Case No.:** UM 1716

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 T. Fox, OSB No. 052551, 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 15th day of April, 20 16.

**X**

(Applicant Signature)

California Bar No.: 234302  
(Home Jurisdiction)

Mailing Address: Keyes, Fox & Wiedman LLP

436 14th Street, Suite 1305

Oakland, CA 94612

Phone: 510-314-8202

FAX: 510-225-3848

Email: jwiedman@kfvlaw.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 \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_.

☐ SEE MATERIALS ATTACHED:

\_\_\_\_\_  
Dawn Evans, Director of Regulatory Services

*Oregon State Bar Regulatory Services, PO Box 231935, Tigard, OR 97281-1935*



**CERTIFICATE OF SERVICE**  
**Docket UM 1716**

I hereby certify that on this 27th day of April, 2016, I completed service for the foregoing MOTION FOR ADMISSION PRO HAC VICE upon the following parties by filing electronically with the Filing Center of the Public Utility Commission of the State of Oregon.

CITIZENS' UTILITY BOARD OF OREGON	610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org
MICHAEL GOETZ CITIZENS' UTILITY BOARD OF OREGON	610 SW BROADWAY STE 400 PORTLAND OR 97206 mike@oregoncub.org
ROBERT JENKS CITIZENS' UTILITY BOARD OF OREGON	610 SW BROADWAY, STE 400 PORTLAND OR 97205 bob@oregoncub.org
<b>ENVIRONMENT OREGON</b>	
CHARLIE FISHER ENVIRONMENT OREGON	1536 SE 11TH AVE STE B PORTLAND OR 97214 charlie@environmentoregon.org
RIKKI SEGUIN ENVIRONMENT OREGON	1536 SE 11TH AVE., STE B PORTLAND OR 97214 rikki@environmentoregon.org
<b>IDAHO POWER UM 1716</b>	
LISA F RACKNER MCDOWELL RACKNER & GIBSON PC	419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 dockets@mrg-law.com
DONOVAN E WALKER IDAHO POWER COMPANY	PO BOX 70 BOISE ID 83707-0070 dwalker@idahopower.com
<b>INTERSTATE RENEWABLE ENERGY COUNCIL UM 1716</b>	
SARA BALDWIN AUCK INTERSTATE RENEWABLE ENERGY COUNCIL INC	PO BOX 1156 LATHAM NY 12110-1156 sarab@irecusa.org
<b>NW ENERGY COALITION UM 1716</b>	
WENDY GERLITZ NW ENERGY COALITION	1205 SE FLAVEL PORTLAND OR 97202 wendy@nwenergy.org
FRED HEUTTE NW ENERGY COALITION	PO BOX 40308 PORTLAND OR 97240-0308 fred@nwenergy.org
<b>NW SEED</b>	
JAIMES VALDEZ NORTHWEST SEED	1819 SW 5TH AVE STE 210 PORTLAND OR 97201

	jaimes@nwseed.org
<b>OBSIDIAN RENEWABLES.</b> DAVID BROWN OBSIDIAN RENEWABLES, LLC	5 CENTERPOINT DR, STE 590 LAKE OSWEGO OR 97035 dbrown@obsidianrenewables.com
LAURIE HUTCHINSON OBSIDIAN RENEWABLES	5 CENTERPOINTE DR STE 590 LAKE OSWEGO OR 97035 lhutchinson@obsidianrenewables.com
RICHARD LORENZ CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP	1001 SW FIFTH AVE - STE 2000 PORTLAND OR 97204-1136 rlorenz@cablehuston.com
<b>OREGON DEPARTMENT OF ENERGY</b> DIANE BROAD *OREGON DEPARTMENT OF ENERGY	625 MARION ST NE SALEM OR 97301-3737 diane.broad@state.or.us
RENEE M FRANCE *OREGON DEPARTMENT OF JUSTICE	NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 renee.m.france@doj.state.or.us
WENDY SIMONS *OREGON DEPARTMENT OF ENERGY	625 MARION ST NE SALEM OR 97301 wendy.simons@state.or.us
<b>OREGONIANS FOR RENEWABLE ENERGY PROGRESS</b> MARK PETE PENGILLY OREGONIANS FOR RENEWABLE ENERGY PROGRESS	PO BOX 10221 PORTLAND OR 97296 mpengilly@gmail.com
<b>OSEIA UM 1716</b> JEFF BISSONNETTE OREGON SOLAR ENERGY INDUSTRIES ASSOCIATION PAUL N ISRAEL OREGON SOLAR ENERGY INDUSTRIES ASSN.	PO BOX 14927 PORTLAND OR 97293-0927 jeff@oseia.org 1436 S HWY 97 REDMOND OR 97756 paul@sunlightsolar.com
<b>PACIFICORP UM 1716</b> PACIFICORP, DBA PACIFIC POWER	825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
ETTA LOCKEY PACIFICORP	825 NE MULTNOMAH ST., STE 1800 PORTLAND OR 97232 etta.lockey@pacificorp.com
<b>PGE UM 1716</b> J RICHARD GEORGE PORTLAND GENERAL ELECTRIC COMPANY	121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 richard.george@pgn.com



JAY TINKER  
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST 1WTC-0306  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com

**RENEWABLE NW UM 1716**

RENEWABLE NORTHWEST

421 SW 6TH AVE., STE. 1125  
PORTLAND OR 97204  
dockets@renewablenw.org

MICHAEL O'BRIEN  
RENEWABLE NORTHWEST

421 SW 6TH AVENUE #1125  
PORTLAND OR 97204  
michael@renewablenw.org

SILVIA TANNER (C)  
RENEWABLE NORTHWEST

421 SW 6TH AVE, STE 1125  
PORTLAND OR 97204  
silvia@renewablenw.org

**STAFF UM 1716**

STEPHANIE S ANDRUS (C)  
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
stephanie.andrus@state.or.us

CINDY DOLEZEL (C)  
PUBLIC UTILITY COMMISSION OF OREGON

201 HIGH ST SE  
SALEM OR 97301  
cindy.dolezel@state.or.us

ARNE OLSON (C)  
ENERGY AND ENVIRONMENTAL  
ECONOMICS, INC.

101 MONTGOMERY ST STE 1600  
SAN FRANCISCO CA 94104  
arne@ethree.com

**THE ALLIANCE FOR SOLAR CHOICE**

KEVIN T FOX  
KEYES FOX & WIEDMAN LLP

1580 LINCOLN ST, STE 880  
DENVER CO 80203  
kfox@kfvlaw.com

KATHLEEN KAPLA  
KEYES FOX & WIEDMAN LLP

8205 31ST AVE NE  
SEATTLE WA 98115  
kkapla@kfvlaw.com

PAMELA MORGAN

17 MASARYK LAKE  
LAKE OSWEGO OR 97035  
pmorgan@eq-research.com

**THE GREEN ENERGY INSTITUTE**

MELISSA POWERS  
LEWIS & CLARK LAW SCHOOL

10015 SW TERWILLIGER BLVD  
PORTLAND OR 97219  
powers@lclark.edu

AMELIA SCHLUSSER  
LEWIS & CLARK LAW SCHOOL

10015 SW TERWILLIGER BLVD  
PORTLAND OR 97219  
ars@lclark.edu

/s/ Philip Jett  
Philip Jett