

September 16, 2016

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-1166

Attn: Filing Center

**Re: UM 1794 – PacifiCorp’s Motion to Admit Counsel *Pro Hac Vice***

PacifiCorp d/b/a Pacific Power (PacifiCorp) encloses for filing in the above-referenced docket its Motion to Admit Counsel *Pro Hac Vice* and the Affidavit of Erin E. Apperson.

PacifiCorp respectfully requests that the Public Utility Commission of Oregon change the parties on the official service list in this proceeding as described below.

Remove: Dustin Till  
Senior Counsel  
Pacific Power  
825 NE Multnomah St., Suite 1800  
Portland OR 97232  
Telephone: (503) 813-6589  
Facsimile: (503) 813-7252  
Email: [Dustin.Till@pacificorp.com](mailto:Dustin.Till@pacificorp.com)

Add: Erin Apperson  
Legal Counsel  
Pacific Power  
825 NE Multnomah St., Suite 1800  
Portland OR 97232  
Telephone: (503) 813-6642  
Facsimile: (503) 813-7252  
Email: [Erin.Apperson@pacificorp.com](mailto:Erin.Apperson@pacificorp.com)

If you have questions about this filing, please contact Natasha Siores at (503) 813-6583.

Sincerely,

  
R. Bryce Dalley  
Vice President, Regulation

## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Motion to Admit Pro Hac Vice and Request for Change of Service List on the parties listed below via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.

### Service List UM 1794

<b>CREA UM 1794</b>	
GREGORY M. ADAMS RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE ID 83702 <a href="mailto:greg@richardsonadams.com">greg@richardsonadams.com</a>	BRIAN SKEAHAN CREA PMB 409 18160 COTTONWOOD RD SUNRIVER OR 97707 <a href="mailto:brian.skeahan@yahoo.com">brian.skeahan@yahoo.com</a>
<b>OSEIA</b>	
JEFF BISSONNETTE OREGON SOLAR ENERGY INDUSTRIES ASSOCIATION PO BOX 14927 PORTLAND OR 97293-0927 <a href="mailto:jeff@oseia.org">jeff@oseia.org</a>	ERICA NIST-LUND OSEIA <a href="mailto:erica@oseia.org">erica@oseia.org</a>
<b>PACIFICORP UM 1794</b>	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 <a href="mailto:oregondockets@pacificorp.com">oregondockets@pacificorp.com</a>	R. BRYCE DALLEY PACIFIC POWE 825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 <a href="mailto:bryce.dalley@pacificorp.com">bryce.dalley@pacificorp.com</a>
DUSTIN T TILL PACIFIC POWER 825 NE MULTNOMAH ST STE 1800 PORTLAND OR 97232 <a href="mailto:dustin.till@pacificorp.com">dustin.till@pacificorp.com</a>	
<b>REC</b>	
JOHN LOWE RENEWABLE ENERGY COALITION 12050 SW TREMONT ST PORTLAND OR 97225-5430 <a href="mailto:jravenesanmarcos@yahoo.com">jravenesanmarcos@yahoo.com</a>	IRION A SANGER SANGER LAW PC 1117 SE 53RD AVE PORTLAND OR 97215 <a href="mailto:irion@sanger-law.com">irion@sanger-law.com</a>
SIDNEY VILLANUEVA SANGER LAW, PC 1117 SE 53RD AVE PORTLAND OR 97215 <a href="mailto:sidney@sanger-law.com">sidney@sanger-law.com</a>	

<b>RENEWABLE NW</b>	
RENEWABLE NORTHWEST 421 SW 6TH AVE., STE. 1125 PORTLAND OR 97204 <a href="mailto:dockets@renewablenw.org">dockets@renewablenw.org</a>	DINA DUBSON KELLEY RENEWABLE NORTHWEST 421 SW 6TH AVE STE 1125 PORTLAND OR 97204 <a href="mailto:dina@renewablenw.org">dina@renewablenw.org</a>
SILVIA TANNER RENEWABLE NORTHWEST 421 SW 6TH AVE, STE 1125 PORTLAND OR 97204 <a href="mailto:silvia@renewablenw.org">silvia@renewablenw.org</a>	
<b>STAFF UM 1794</b>	
BRITTANY ANDRUS PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM OR 97308-1088 <a href="mailto:brittany.andrus@state.or.us">brittany.andrus@state.or.us</a>	STEPHANIE S ANDRUS PUC STAFF--DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 <a href="mailto:stephanie.andrus@state.or.us">stephanie.andrus@state.or.us</a>

Dated this 16<sup>th</sup> day of September, 2016.

  
 Jennifer Angell  
 Supervisor, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

UM 1794

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,


Investigation into Schedule 37 – Avoided  
Cost Purchases from Qualifying Facilities  
of 10,000 kW or Less.

MOTION TO ADMIT COUNSEL  
*PRO HAC VICE*

In accordance with OAR 860-001-0320 and UTCR 3.170, PacifiCorp d/b/a Pacific Power (PacifiCorp) moves the Public Utility Commission of Oregon for an order allowing the association of Washington attorney Erin E. Apperson in the above-captioned matter. This Motion is supported by the attached Affidavit of Ms. Apperson and Certificate of Good Standing from the Washington State Supreme Court.

Respectfully submitted this 16<sup>th</sup> day of September, 2016.

By:

  
\_\_\_\_\_  
Sarah E. Kamman  
Vice President & General Counsel  
PacifiCorp d/b/a Pacific Power

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1794

In the Matter of

PACIFICORP d/b/a PACIFIC POWER,

Investigation into Schedule 37 – Avoided  
Cost Purchases from Qualifying Facilities  
of 10,000 kW or Less.

AFFIDAVIT OF  
ERIN E. APPERSON  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL *PRO HAC VICE*

I, Erin E. Apperson, do swear and affirm:

1. I am admitted to practice 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.

2. In this matter, I will associate with Sarah E. Kamman, Oregon State Bar No. 002926, who, to the best of my knowledge, is an active member in good standing of the Oregon State Bar. I am currently employed as Legal Counsel for PacifiCorp d/b/a Pacific Power (PacifiCorp).

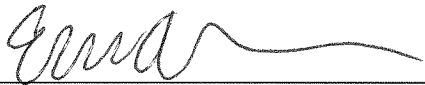
3. I will comply with all applicable statutes, laws, and procedural rules of the state of Oregon; be familiar with and comply with the Oregon Rules of Professional Conduct; and submit to the jurisdiction of the Oregon courts and the Oregon State Bar Association with respect to acts and omissions occurring during my admission in this proceeding.

4. As an in-house attorney, I am exempt from the Oregon State Bar Professional Liability Fund Plan requirement.

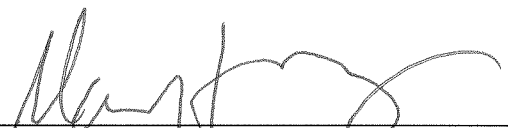
5. I agree, as a continuing obligation under UTCR 3.170(1)(f), to notify the Public Utility Commission of Oregon promptly of any changes in my status.

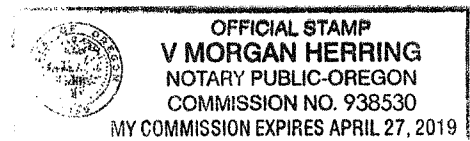
I declare under penalty of perjury under the laws of the state of Oregon that the foregoing is true and correct based on my information and belief.

SIGNED this 16<sup>th</sup> day of September at Portland, Oregon.

Signed:   
Erin E. Apperson  
Legal Counsel  
PacifiCorp d/b/a Pacific Power

SUBSCRIBED AND SWORN to before me this 16 day of September, 2016.

  
NOTARY PUBLIC FOR OREGON  
My Commission Expires: April 27, 2019



**IN THE SUPREME COURT OF THE STATE OF WASHINGTON**

IN THE MATTER OF THE ADMISSION	)	BAR NO. 43693
	)	
OF	)	<b>CERTIFICATE</b>
	)	
ERIN ELIZABETH APPERSON	)	<b>OF</b>
	)	
TO PRACTICE IN THE COURTS OF THIS STATE	)	<b>GOOD STANDING</b>
	)	

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

**ERIN ELIZABETH APPERSON**

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 31, 2011, 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 18<sup>th</sup> day of July, 2016.

A handwritten signature in cursive script, reading "Susan L. Carlson", written over a horizontal line.

Susan L. Carlson  
Supreme Court Clerk  
Washington State Supreme Court