

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2024**

In the Matter of

ALLIANCE OF WESTERN ENERGY  
CONSUMERS,

Investigation Into Long-Term Direct  
Access Programs.

**MOTION FOR ADMISSION PRO HAC  
VICE AND AFFIDAVIT OF LAURA K.  
GRANIER**

NOW COMES Austin W. Jensen, an attorney licensed to practice law in the State of Oregon, hereby moves the Commission to permit Laura K. Granier, Esq. to appear and participate as co-counsel for Intervenor Brookfield Renewable Trading and Marketing LP (“BRTM”) in the above-captioned case. The reasons for this Motion are set forth in the attached Memorandum in Support.

Respectfully submitted,

HOLLAND & HART LLP

*/s/ Austin W. Jensen*

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Austin W. Jensen (OSB #220547)  
Holland & Hart LLP  
555 Seventeenth Street, Suite 3200  
Denver, CO 80202  
Ph: (303) 395-8000  
E-mail: awjensen@hollandhart.com

ATTORNEY FOR BROOKFIELD RENEWABLE  
TRADING  
AND MARKETING LP

Dated: December 4, 2023

**MEMORANDUM IN SUPPORT**

Austin W. Jensen, an attorney licensed to practice law in the State of Oregon, hereby moves the Commission to permit Laura K. Granier, Esq. to appear and participate as counsel before the Commission in all proceedings in this matter. Laura K. Granier, Esq. is a licensed attorney in good standing in Nevada. A copy of the Certificate of Good Standing from Nevada is attached. Also attached is a Certificate of Liability Insurance verifying that the applicant is insured.

Thus, the Commission should grant this Motion for Admission Pro Hac Vice.

Respectfully submitted,

HOLLAND & HART LLP

*/s/ Austin W. Jensen*

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Austin W. Jensen (OSB #220547)

Holland & Hart LLP

555 Seventeenth Street, Suite 3200

Denver, CO 80202

Ph: (303) 395-8000

E-mail: awjensen@hollandhart.com

ATTORNEY FOR BROOKFIELD RENEWABLE  
TRADING  
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In the Matter of

ALLIANCE OF WESTERN ENERGY  
CONSUMERS,

Investigation Into Long-Term Direct  
Access Programs.

AFFIDAVIT OF LAURA K. GRANIER

STATE OF NEVADA                    )  
  ) SS  
COUNTY OF Washoe                )

Laura K. Granier, Esq., being duly sworn, deposes and states that the following is true to her personal knowledge and belief:

1. Laura K. Granier, Esq., counsel for BTRM, certifies that she is not subject to pending disciplinary proceedings in any other jurisdiction.
2. Laura K. Granier will associate with Austin W. Jensen. Mr. Jensen, an attorney licensed to practice law in the State of Oregon, will participate meaningfully in the above-referenced matter. Mr. Jensen's contact information is below and is already included on the Commission's Certificate of Service in this proceeding.

Austin W. Jensen (OSB #220547)  
Holland & Hart LLP  
555 Seventeenth Street, Suite 3200  
Denver, CO 80202  
Ph: (303) 295-8012  
E-mail: [awjensen@hollandhart.com](mailto:awjensen@hollandhart.com)

3. Laura K. Granier, Esq. will comply with all applicable statutes, laws and procedural rules of the State of Oregon.

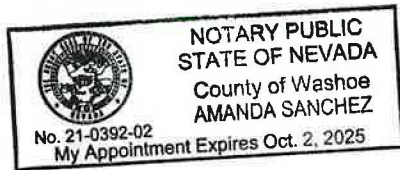
4. Counsel will notify the trial court or administrative body promptly of any changes in insurance or status.

Respectfully submitted,



Laura K. Granier  
Holland & Hart LLP  
5441 Kietzke Lane, 2nd Floor  
Reno, NV 89511  
Ph: 775-327-3089  
E-mail: [lkgranier@hollandhart.com](mailto:lkgranier@hollandhart.com)

SUBSCRIBED AND SWORN TO before me this 18<sup>th</sup> day of ~~November~~, 2023 by LAURA K. GRANIER. December



  
Notary Public, State of Nevada  
My Commission Expires: 10/2/25

In re: Laura Granier  
Name of Out-of-State Attorney

Certificate of Compliance  
For Pro Hac Vice Admission

I, Laura Granier (print name), am an attorney in the State of Nevada  
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: Alliance of Western Energy Consumers, Petition for Investigation into Long Term Direct Access Programs

Court: Public Utilities Commission of Oregon Case No.: UM 2024

I certify that (check all that apply):

- I am an attorney in good standing in the State of Nevada, 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 Austin Jensen Bar# 220547, OSB No. 220547, 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 13th day of November, 202023.

X *Laura K. Granier*  
(Applicant Signature)

Nevada Bar No.: 7357  
(Home Jurisdiction)

Mailing Address: 5441 Kietzke Lane, Second Floor  
Reno, NV 89511

Phone: (775)327-3000  
FAX: (775)786-6190  
Email: LKGranier@hollandhart.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 13th day of November, 2023.

SEE MATERIALS ATTACHED:

*Troy Wood*  
Troy Wood, Regulatory Counsel

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

# STATE BAR OF NEVADA



## CERTIFICATE OF STANDING

**Issue Date:** 10/31/2023  
**Attorney Name:** Laura K. Granier  
**Nevada Bar Number:** 7357  
**License Type:** ATTORNEY  
**License Status:** Active  
**Admit/Certification Date:** 9/29/2000

3100 W. Charleston Blvd.  
Suite 100  
Las Vegas, NV 89102  
phone 702.382.2200  
toll free 800.254.2797  
fax 702.382.2075

9456 Double R Blvd., Ste. B  
Reno, NV 89521-5977  
phone 775.329.4100  
fax 775.329.0522

[www.nvbar.org](http://www.nvbar.org)

To Whom It May Concern:

The State Bar of Nevada records indicate that the attorney named above was admitted or certified to practice in the State of Nevada and is in good standing as of the issue date.

If the attorney's License Type is NMATTORNEY (non-member attorney), they were certified to practice pursuant to Nevada Supreme Court Rule 49.1 'Limited practice certification for certain attorneys'. Refer to License Status for the subsection.

This certification expires 30 days from the issue date unless sooner revoked or rendered invalid by operation of rule or law.

Questions may be directed to [memberservices@nvbar.org](mailto:memberservices@nvbar.org).

A handwritten signature in cursive script that reads "Mary Jorgensen". The signature is written in black ink and is positioned above a horizontal line.

Mary Jorgensen  
Member Services Director

No.2023 -10504616

verify by email at [memberservices@nvbar.org](mailto:memberservices@nvbar.org)



November 1, 2023

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 Holland & Hart LLP and Laura Grainer have Professional Liability Coverage under Policy LPL-1023-2023 with limits of liability not less than \$5,000,000 per claim and \$5,000,000 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 \$1,500,000 each claim up to an aggregate of \$3,000,000 and \$100,000 each claim thereafter.

The Policy effective date is from January 1, 2023 to January 1, 2024.

The Policy is a claims-made policy and 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 LTD.,  
A RISK RETENTION GROUP**

A handwritten signature in black ink that reads "Anne M. Mahoney". The signature is written in a cursive style.

By:  
Anne M. Mahoney  
Assistant Director of Underwriting

Date: 11/01/2023

311 S. Wacker Drive, Suite 5700  
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tel 312.697.6900  
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