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June 22, 2016

Oregon Public Utilities Commission Attn: Filing Center 3930 Fairview Industrial Drive SE PO Box 1088 Salem, OR 97308

Re:

UM 1751 Implementing Energy Storage Program Guidelines

pursuant to House Bill 2193

Attention Filing Center:

Please find attached for filing the Motion for Pro Hac Vice, with supporting documents regarding representation of the Interstate Renewable Energy Council, Inc. by California attorney Sky C. Stanfield and the accompanying Certificate of Service, to be electronically filed, June 22, 2016.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Amy Zehring, Secretary

794892.1

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF OREGON

UM 1751

In the Matter of

PUBLIC UTILITY COMMISSION OF OREGON,

Implementing Energy Storage Program Guidelines pursuant to House Bill 2193. MOTION FOR ADMISSION PRO HAC VICE

Pursuant to UTCR 3.170, I, Sky C. Stanfield move the Public Utility Commission of Oregon for an Order allowing my representation of the Interstate Renewable Energy Council, Inc. in the above captioned proceeding. This Motion is supported by the attached Affidavit of Sky C. Stanfield and the Certificate of Standing from the State Bar of California.

Respectfully submitted this 2 day of June 2016.

SKY C. STANFIELD

SHUTE, MIHALY & WEINBERGER LLP

396 Hayes Street

San Francisco, California 94102

Telephone:

(415) 552-7272

Facsimile:

(415) 552-5816

Email: stanfield@smwlaw.com

CA State Bar No. 244966

Attorney for: INTERSTATE

RENEWABLE ENERGY COUNCIL, INC.

794893.1

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF OREGON

UM 1751

In the Matter of	AFFIDAVIT OF SKY C. STANFIELD
PUBLIC UTILITY COMMISSION OF OREGON,	
Implementing Energy Storage Program Guidelines pursuant to House Bill 2193.	
STATE OF CALIFORNIA) COUNTY OF SAN FRANCISCO) ss	•

Sky C. Stanfield, being duly sworn, deposes and states that the following is true to her personal knowledge and belief:

- 1. Sky C. Stanfield counsel for the Interstate Renewable Energy Council, Inc. certifies that she is not subject to pending disciplinary proceedings in any other jurisdiction.
- 2. Sky C. Ştanfield will associate with Elisabeth Holmes, an attorney licensed to practice law in the State of Oregon, who will participate meaningfully in the above-referenced matter.

Ms. Holmes's contact information is below and she should be added to the Commission's Certificate of Service.

Elisabeth Holmes, OR Bar No. 120254 Blue River Law, P.C. P.O. Box 293 Eugene, Oregon 97440 Tel. (541) 870-7722 Email: eli.blueriverlaw@gmail.com

- 3. Sky C. Stanfield will comply with all applicable statues, laws and procedural rules of the State of Oregon.
- 4. Counsel will notify the Public Utility Commission promptly of any changes in insurance or status.

Signed this 21 day of June 2016

SKY C. STANFIELD

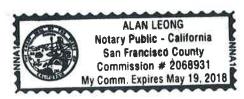
Subscribed and sworn before me this 22 day of June 2016.

STATE OF CALIFORNIA COUNTY OF

Notary Public, State of California

My commission expires _

794895.1



180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

June 20, 2016

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SKY CEDAR PEACOCK STANFIELD, #244966 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2006; 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

Kathan Lambert

Custodian of Membership Records



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

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 Edgewood Partners Insurance Ce		CONTACT NAME: Dani Pless PHONE (A/C, No, Ext):916-576-1605	FAX (A/C, No):916-848-3548		
P. O. Box 13847 License No. 0B29370		ADDRESS:Dani.Pless@epicbrokers.com			
Sacramento CA 95853	INSURER(S) AFFORDING COVERAGE	NAIC #			
		INSURER A :Republic Indemnity of America	22179		
INSURED		INSURER B : Federal Insurance Company	20281		
Shute Mihaly & Weinberger LLP		INSURER C :Lloyds of London	85202		
396 Hayes Street San Francisco CA 94102		INSURER D:			
		INSURER E :			
		INSURER F:			
COVERAGES	CERTIFICATE NUMBER: 967002368	REVISION NU	MBER:		

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 SUE		POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMIT	S
В	X COMMERCIAL GENERAL LIABILITY		36036940	2/27/2016	2/27/2017	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence)	\$1,000,000 \$1,000,000
	CLAIMS-MADE X OCCUR					MED EXP (Any one person)	\$10,000
						PERSONAL & ADV INJURY	\$1,000,000
						GENERAL AGGREGATE	\$2,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:					PRODUCTS - COMP/OP AGG	\$2,000,000
	POLICY PRO- JECT LOC						\$
В	AUTOMOBILE LIABILITY		73592954	2/27/2016	2/27/2017	(Ea accident)	\$1,000,000
	ANY AUTO					BODILY INJURY (Per person)	\$
	ALL OWNED SCHEDULED AUTOS					BODILY INJURY (Per accident)	\$
	X HIRED AUTOS X NON-OWNED AUTOS					PROPERTY DAMAGE (Per accident)	\$
						0.00	\$
В	X UMBRELLA LIAB X OCCUR		78181273	2/27/2016	2/27/2017	EACH OCCURRENCE	\$3,000,000
	EXCESS LIAB CLAIMS-MADE				5	AGGREGATE	\$3,000,000
	DED X RETENTION \$0						\$
Α	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY		188942	6/8/2016	6/8/2017	X WC STATU- OTH- TORY LIMITS ER	
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED?	N/A				E.L. EACH ACCIDENT	\$1,000,000
	(Mandatory in NH)					E.L. DISEASE - EA EMPLOYEE	\$1,000,000
	If yes, describe under DESCRIPTION OF OPERATIONS below					E.L. DISEASE - POLICY LIMIT	\$1,000,000
С	Professional Liability Claims Made		BN302200K	3/1/2016	3/1/2017	Per Claim Aggregate Deductible	\$2,000,000 \$4,000,000 \$75,000
_							

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

RE: Evidence of Coverage. When required by written contract, additional insured status with primary coverage and waiver of subrogation apply to General Liability and Automobile Liability, all per the attached endorsements.

CERTIFICATE HOLDER	CANCELLATION
Oregon State Bar Center PO Box 231935 Tigard OR 97281	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
t.	authorized representative Construction

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)	
In re: Sky C. Stanfield)	Certificate of Compliance
Name of Out-of-State Attorney)	For Pro Hac Vice Admission
I. Sky C. Stanfield	(print	t name), am an attorney in the State of California
and I intend to seek <i>pro hac vice</i> admission in accordance with OR proceeding:	S 9.24	1 and UTCR 3.170 in the following Oregon court action of
Case Name: Implementing Energy Storage Prog	ıram G	Buidelines pursuant to House Bill 2193
Court: Public Utility Commission of Oregon		Case No.: UM 1751
I certify that (check all that apply):	y.	
 ✓ I am an attorney in good standing in the State of California certificate issued by the licensing authority in that state. ✓ I am not subject to any pending disciplinary proceedings in another attachment to this certificate. ✓ I intend to associate in the above-referenced action or proceeding. ✓ I will comply with applicable statutes, laws, and procedural rul disciplinary rules of the Oregon State Bar; and submit to the jurisdicacts and omissions occurring during my pro hac vice admission. ✓ My private law practice activities in Oregon are covered by prostate Bar Professional Liability Fund plan, as evidenced by the attacted agree, as a continuing obligation of pro hac vice admission, to coverage, or my admission or disciplinary status in any other jurisdicated is granted. In the event pro hac vice admission is revoked for I submit \$500 to the Oregon State Bar as payment of the pro hac Supreme Court. I acknowledge that this fee is for a period of twelve below, and that an additional fee of \$500 will be required in order feevery twelve-month period thereafter. 	r jurisding with gon States of the tion of offession ched cero notify iction. Itting many reaction of the tion of the tion of the tion of the tion.	Elisabeth Holmes , OSB No. te Bar, who will participate meaningfully in the matter. se State of Oregon; be familiar with and comply with f the Oregon courts and Oregon State Bar with respect to nal liability insurance substantially equivalent to the Oregon retificate of insurance coverage. The trial court promptly of any changes in my insurance the pro hac vice in the above-referenced matter when such an ison, I will promptly notify the Oregon State Bar. fee established by ORS 9.241 and the rules of the Oregon is from the date of the Acknowledgment of Receipt issued
Dated this day of June , 2	0 <u>16</u> . Ca	alifornia Bar No.: 244966
(Applicant Signature)	-	Iome Jurisdiction)
Mailing Address: Shute, Mihaly & Weinberger LLP	Ph	one: 415-552-7272
396 Hayes Street		X: 415-552-5816
San Francisco, CA 94102	En	nail: stanfield@smwlaw.com
Acknowledgm	ent o	of Receipt
As Director of Regulatory Services of the Oregon State Bar, I acl Certificate of Compliance for Pro Hac Vice Admission and attachments, an Oregon action or proceeding. The fee is for a period of twelve months from	knowled d the \$5	lge receipt from the above-named out-of-state attorney of the 500 fee for pro hac vice appearance in the above-referenced
Dated this, 20 _		
☐ SEE MATERIALS ATTACHED:		
	Da	awn Evans, Director of Regulatory Services

CERTIFICATE OF SERVICE Docket UM 1751

I hereby certify that on this 22nd day of June, 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

MICHAEL GOETZ CITIZENS' UTILITY BOARD OF OREGON

ROBERT JENKS CITIZENS' UTILITY BOARD OF OREGON

CREA UM 1751

GREGORY M. ADAMS RICHARDSON ADAMS, PLLC

BRIAN SKEAHAN CREA

ENERGY FREEDOM COALITION

KEVIN T FOX KEYES FOX & WIEDMAN LLP

MEREDITH A ROBERTS SOLARCITY

ENERGY STORAGE ASSOCIATION

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ICNU UM 1751

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INTERSTATE RENEWABLE ENERGY COUNCIL

SARA BALDWIN AUCK INTERSTATE RENEWABLE ENERGY COUNCIL INC

LATHAM NY 12110-1156 sarab@irecusa.org

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DIANE HENKELS CLEANTECH LAW PARTNERS PC

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PUC STAFF--DEPARTMENT OF JUSTICE

JOHN CRIDER
PUBLIC UTILITY COMMISSION OF OREGON

ELANIE PRAUSE
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/s/ Amy Zehring
Amy Zehring