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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:

<u>UM 1751 Implementing Energy Storage Program Guidelines</u>

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 Joseph D. Petta and the accompanying Certificate of Service, to be electronically filed, June 21, 2016.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Amy Zehring, Secretary

794507.1

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, Joseph D. Petta 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 Joseph D. Petta and the Certificate of Standing from the State Bar of California.

Respectfully submitted this 21 day of June 2016.

JOSEPH D. PETTA

SHUTE, MIHALY & WEINBERGER LLP

396 Hayes Street

San Francisco, California 94102

Telephone: (415) 552-7272

Facsimile:

(415) 552-5816

Email: petta@smwlaw.com

CA State Bar No. 286665

Attorney for: INTERSTATE

RENEWABLE ENERGY COUNCIL, INC.

794511.1

DEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF OREGON

UM 1751

In the Matter of	AFFIDAVIT OF JOSEPH D. PETTA
PUBLIC UTILITY COMMISSION OF OREGON,	
Implementing Energy Storage Program Guidelines pursuant to House Bill 2193.	
STATE OF CALIFORNIA) COUNTY OF SAN FRANCISCO)	ss:

Joseph D. Petta, being duly sworn, deposes and states that the following is true to his personal knowledge and belief:

- 1. Joseph D. Petta counsel for the Interstate Renewable Energy Council, Inc. certifies that he is not subject to pending disciplinary proceedings in any other jurisdiction.
- 2. Joseph D. Petta will associate with Elisabeth Holmes, an attorney licensed to practice law in the State of Oregon, 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. Joseph D. Petta will comply with all applicable statues, law 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 22 day of June 2016

JOSEPH D. PETTA

Subscribed and sworn before me this day of June 2016.

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness; accuracy, or validity of that document.

STATE OF CALIFORNIA COUNTY OF _

David Petta

proved to me on the basis of satisfactory evidence to be the person(s) who appear

before me.

Notary Public, State of California

My commission expires

794513.1

ALAN LEONG Notary Public - California San Francisco County Commission # 2068931 My Comm. Expires May 19, 2018 180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

June 16, 2016

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JOSEPH DAVID PETTA, #286665 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 2012; 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

Journ James

Custodian of Membership Records



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 6/1/2016

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).

	ertificate holder in lieu of such endor	seme	ent(s)).	iluoise	iliciii. A Sia	tement on t	ns certificate does not d	onier	ignts to the		
	PRODUCER					CONTACT NAME: Dani Pless						
Edgewood Partners Insurance Center				PHONE (A/C, No. Ext):916-576-1605 (A/C, No.):916-848-3548								
	D. Box 13847 ense No. 0B29370				E-MAIL ADDRESS:Dani.Pless@epicbrokers.com							
	cramento CA 95853				INSURER(S) AFFORDING COVERAGE					NAIC#		
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$ _{Shi}$	ute Mihaly & Weinberger LLP				INSURER B :Federal Insurance Company					20281		
396	6 Hayes Street				INSURER C : Lloyds of London INSURER D :					85202		
Sai	n Francisco CA 94102											
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INSF LTR		INSR	WVD	POLICY NUMBER		POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS				
В	GENERAL LIABILITY			36036940		2/27/2016	2/27/2017	EACH OCCURRENCE \$1,000		,000		
	X COMMERCIAL GENERAL LIABILITY							DAMAGE TO RENTED PREMISES (Ea occurrence)	\$1,000,	,000		
	CLAIMS-MADE X OCCUR							MED EXP (Any one person)	\$10,000	0		
l								PERSONAL & ADV INJURY	\$1,000,	.000		
								GENERAL AGGREGATE	\$2,000,	.000		
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								(2) 11 (1) 11 (1) (1) (1) (1) (1) (1) (1)	\$			
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AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)			188942		6/8/2016	6/8/2017	X WC STATU- OTH- TORY LIMITS ER					
								E.L. EACH ACCIDENT	\$1,000,	.000		
						E.L. DISEASE - EA EMPLOYEE						
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - POLICY LIMIT \$1,000,000					
С	Professional Liability			BN302200K		3/1/2016	3/1/2017		\$2,000,0			
	Claims Made						0/1/201/	Aggregate \$4,000,0		000		
								Deductible	\$75,000			
DES	CRIPTION OF OPERATIONS / LOCATIONS / VEHIC	ES (/	Attach	ACORD 101, Additional Remarks	Schedule	, if more space is	s required)					
								overage and waiver of	subroc	nation		
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												
CERTIFICATE HOLDER CANCELLATION												
Oregon State Bar Center PO Box 231935				SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN								
											Tigard OR 97281	
					AUTHORIZED REPRESENTATIVE							
					O O O O							

)
In re: Joseph D. Petta) Certificate of Compliance
Name of Out-of-State Attorney) For <i>Pro Hac Vice</i> Admission
I, Joseph D. Petta	(print 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:	RS 9.241 and UTCR 3.170 in the following Oregon court action or
Case Name: Implementing Energy Storage Prog	gram Guidelines pursuant to House Bill 2193
Court: Public Utility Commission of Oregon	Case No.: <u>UM 1751</u>
I certify that (check all that apply):	
attachment to this certificate. I intend to associate in the above-referenced action or proceeding 120254 and active member in good standing of the Oregom I will comply with applicable statutes, laws, and procedural rule disciplinary rules of the Oregon State Bar; and submit to the jurisdict acts 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 attact I agree, as a continuing obligation of pro hac vice admission, to coverage, or my admission or disciplinary status in any other jurisdictive I will provide to the Oregon State Bar a copy of the order admit order is granted. In the event pro hac vice admission is revoked for a	er jurisdiction, the nature and status of which are described in an aing with Elisabeth Holmes , OSB No. gon State Bar, who will participate meaningfully in the matter. les of the State of Oregon; be familiar with and comply with action of the Oregon courts and Oregon State Bar with respect to offessional liability insurance substantially equivalent to the Oregon ached certificate of insurance coverage. To notify the trial court promptly of any changes in my insurance liction. The interpretation in the above-referenced matter when such an any reason, I will promptly notify the Oregon State Bar. The vice fee established by ORS 9.241 and the rules of the Oregon emonths from the date of the Acknowledgment of Receipt issued
Dated thisday of June, 2	20 16
x men	California Bar No.: 286665
(Applicant Signature)	(Home Jurisdiction)
Mailing Address: Shute, Mihaly & Weinberger LLP	Phone: 415-552-7272
396 Hayes Street	FAX: 415-552-5816
San Francisco, CA 94102	Email: petta@smwlaw.com
Acknowledgm	nent of Receipt
9	cknowledge receipt from the above-named out-of-state attorney of the nd the \$500 fee for pro hac vice appearance in the above-referenced
Dated this day of, 20	
SEE MATERIALS ATTACHED:	Dawn 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

JASON BURWEN ENERGY STORAGE ASSOCIATION

JEFF CRAMER 38 NORTH SOLUTIONS

ICNU UM 1751

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333 SW TAYLOR SUITE 400 PORTLAND OR 97204 tcp@dvclaw.com

INTERSTATE RENEWABLE ENERGY COUNCIL

SARA BALDWIN AUCK INTERSTATE RENEWABLE ENERGY COUNCIL INC PÓ BOX 1156 LATHAM NY 12110-1156 sarab@irecusa.org

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PGE RATES & REGULATORY AFFAIRS

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RENEWABLE NORTHWEST UM 1751

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JAMES BIRKELUND
SMALL BUSINESS UTILITY ADVOCATES

DIANE HENKELS CLEANTECH LAW PARTNERS PC

STAFF UM 1751

STEPHANIE S ANDRUS
PUC STAFF--DEPARTMENT OF JUSTICE

JOHN CRIDER PUBLIC UTILITY COMMISSION OF OREGON

ELANIE PRAUSE
PUBLIC UTILITY COMMISSION OF OREGON

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/s/ Amy Zehring
Amy Zehring