

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
1750 SW Harbor Way, Suite 450  
Portland, OR 97201

December 21, 2018

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem, OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY  
Request to Update its Schedule 201 and Standard Power Purchase  
Agreements.  
**Docket No. UM 1987**

Dear Filing Center:

Please find enclosed the Motion of the Alliance of Western Energy Consumers (“AWEC”) to Admit Counsel *Pro Hac Vice* in the above-referenced docket. Also enclosed is the supporting Affidavit of Myraleigh A. Alberto. Please note that AWEC is requesting expedited consideration of its motion.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch

Jesse O. Gorsuch

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**UM 1987**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	MOTION OF THE ALLIANCE OF
COMPANY,	)	WESTERN ENERGY CONSUMERS
	)	TO ADMIT COUNSEL <i>PRO HAC VICE</i>
	)	
Request to Update its Schedule 201 and	)	<b><i>EXPEDITED CONSIDERATION</i></b>
Standard Power Purchase Agreements.	)	<b><i>REQUESTED</i></b>
_____	)	

Pursuant to UTCR 3.170 and OAR § 860-001-0320, the Alliance of Western Energy Consumers (“AWEC”) moves to admit Myraleigh A. Alberto, a member in good standing of the Nevada State Bar, as counsel *pro hac vice* in the proceedings before the Oregon Public Utility Commission in this docket. Because the prehearing conference in this matter is scheduled for next week, and due to the upcoming holiday, AWEC requests expedited consideration of this motion.

In support of this motion, AWEC has attached the Affidavit of Myraleigh A. Alberto, including Attachments A – C thereto.

Dated this 21st day of December, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers

PAGE 1 – AWEC MOTION TO ADMIT COUNSEL PRO HAC VICE

DAVISON VAN CLEVE, P.C.  
1750 SW Harbor Way, Suite 450  
Portland, OR 97201  
Telephone: (503) 241-7242

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1987**

In the Matter of

PORTLAND GENERAL ELECTRIC  
COMPANY,

Request to Update its Schedule 201 and  
Standard Power Purchase Agreements.

AFFIDAVIT OF  
MYRALEIGH A. ALBERTO

I, MYRALEIGH A. ALBERTO, being first duly sworn on oath, depose and say:

1. My name is Myraleigh A. Alberto. I am an active member in good standing of the State Bar of Nevada, and my Nevada State Bar No. is 14340. I am not subject to any pending disciplinary proceedings in Nevada, or in any other jurisdiction. I have attached a Certificate of Good Standing from the Nevada State Bar as Attachment A.

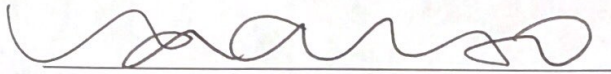
2. If granted permission to practice before the Oregon Public Utility Commission (“Commission”) in Docket No. UM 1987, I will associate in this matter with Tyler C. Pepple, Oregon State Bar No. 132256. Mr. Pepple, a partner at the firm of Davison Van Cleve, P.C. (“DVC”), and an active member in good standing of the Oregon State Bar, will participate meaningfully in Docket No. UM 1987.

3. I will comply with all applicable statutes, laws, and procedural rules of the State of Oregon; be familiar with and comply with the 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. I have attached my Certificate of Compliance for *Pro Hac Vice* Admission as Attachment B.

4. Included as Attachment C to this Affidavit is a copy of DVC's 2018 Professional Liability Fund ("PLF") Excess Coverage Plan, which identifies me among the attorneys covered under DVC's PLF Excess Coverage Plan in Oregon.

5. I agree to notify this Commission of any changes in my insurance or status, as required by UTCR 3.170(1)(f).

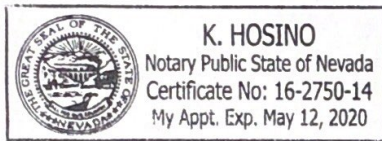
Dated this 21 day of December, 2018.



MYRALEIGH A. ALBERTO

State of Nevada, County of Nye

SUBSCRIBED AND SWORN to before me this 21 day of December, 2018.



Notary Public for Nevada

My Commission Expires: May 12, 2020

# *State Bar of Nevada*

## *Certificate of Good Standing*



IT IS HEREBY CERTIFIED that Myraleigh A. Alberto,  
Bar Number 14340 was admitted by the Supreme Court of the State of Nevada on  
05/17/2017 as an Attorney and Counselor at Law duly licensed to practice in all courts of  
the State of Nevada. It is further certified that Myraleigh A. Alberto is now an  
Active member of the State Bar of Nevada in good standing.

DATED Wednesday, December 19, 2018.

Elizabeth M Pastore  
Elizabeth M Pastore  
Member Services Administrator  
State Bar of Nevada



In re: Myraleigh A. Alberto )  
          Name of Out-of-State Attorney )

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

I, Myraleigh A. Alberto (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:

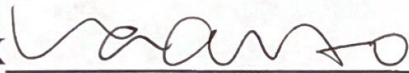
Case Name: PGE - Request to Update Schedule 201 and Standard PPAs

Court: Public Utility Commission of Oregon Case No.: UM 1987

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 Tyler C. Pepple, OSB No. 132256, 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 21 day of December, 20 18.

X   
(Applicant Signature)

Nevada Bar No.: 14340  
(Home Jurisdiction)

Mailing Address: 5795 Rogers St.  
Las Vegas, NV 89118

Phone: (503) 241-7242  
FAX: (503) 241-8160  
Email: maa@dvclaw.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



## Excess Coverage

## 2018 Declarations Sheet

### EXCESS PLAN NUMBER 18-241-7242

CLAIMS MADE EXCESS PLAN. THIS EXCESS PLAN PROVIDES COVERAGE FOR ONLY THOSE CLAIMS THAT ARE FIRST MADE AGAINST THE COVERED PARTY DURING THE COVERAGE PERIOD OR THE EXTENDED REPORTING PERIOD, IF PURCHASED, AND REPORTED TO US IN ACCORDANCE WITH THE TERMS OF THIS EXCESS PLAN. PLEASE REVIEW THE EXCESS PLAN CAREFULLY.

THIS EXCESS CONTAINS PROVISIONS THAT REDUCE THE LIMITS OF COVERAGE STATED IN THE EXCESS PLAN BY THE COSTS OF LEGAL DEFENSE.

THIS EXCESS PLAN IS ASSESSABLE AS PROVIDED UNDER SECTION XII OF THE EXCESS PLAN AND IN THE APPLICATION.

**1. THE FIRM:**

DAVISON VAN CLEVE

**2. ADDRESS:**

333 SW TAYLOR ST  
PORTLAND, OR 97204

**3. COVERAGE PERIOD:**

JANUARY 01, 2018 TO DECEMBER 31, 2018

**4. LIMITS OF COVERAGE:**

\$1,700,000 EACH CLAIM  
\$1,700,000 AGGREGATE  
EXCESS OF PLF PRIMARY LIMITS

\$2,000,000 EACH CLAIM FOR NON-OREGON ATTORNEYS  
\$2,000,000 AGGREGATE FOR NON-OREGON ATTORNEYS

**5. DEDUCTIBLE:**

NONE / \$5,000 EACH CLAIM FOR NON-OREGON ATTORNEYS

**6. EXCESS PLAN ASSESSMENT:**

\$11,357

**7. ENDORSEMENTS:**

D - CYBER LIABILITY AND BREACH RESPONSE

**8. RETROACTIVE DATE:**

APPLICABLE 2018 PLF CLAIMS MADE PLAN RETROACTIVE DATE(S)  
OR 09/01/2016, WHICHEVER DATE IS MOST RECENT.

DECLARATION SHEET FOR EXCESS COVERAGE  
18-241-7242 DAVISON VAN CLEVE

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**9. EXCESS PLAN FORM:**

2018 CLAIMS MADE EXCESS PLAN

**10. FIRM ATTORNEYS:**

N00588 Myraleigh A Alberto  
N00583 Patrick Oshie  
132256 Tyler Case Pepple  
863066 S Bradley Van Cleve  
124956 Joshua D Weber  
171782 Riley Gale Peck

**11. PREDECESSOR FIRMS:**

-- NONE --

**12. FORMER ATTORNEYS:**

082940 Jesse Emmett Cowell  
930572 Estate of Melinda J Davison  
003750 Irion A Sanger

**13. OTHER CONDITIONS OR REQUIREMENTS:**

-- NONE --

**14. CURRENT NON-OREGON ATTORNEYS**

BAR#	NAME
N00588	Myraleigh A Alberto
N00583	Patrick Oshie

RETROACTIVE  
DATE

**15. FORMER NON-OREGON ATTORNEYS**

-- NONE --

**16. EXCLUDED ATTORNEYS**

-- NONE --

**17. EXCLUDED FIRMS**

-- NONE --