# Davison Van Cleve PC

# Attorneys at Law

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January 27, 2022

## 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 ALLIANCE OF WESTERN ENERGY CONSUMERS

Petition for Investigation Into Long-Term Direct Access Programs.

Docket No. UM 2024

Dear Filing Center:

Please find enclosed the Motion of the Alliance of Western Energy Consumers to Admit Counsel *Pro Hac Vice* in the above-referenced docket. Also enclosed is the supporting Affidavit of Curt R. Ledford.

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

Sincerely,

/s/ Jesse O. Gorsuch Jesse O. Gorsuch

**Enclosures** 

#### BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

#### **UM 2024**

In the Matter of	
	) MOTION OF THE ALLIANCE OF
ALLIANCE OF WESTERN ENERGY	) WESTERN ENERGY CONSUMERS
CONSUMERS,	TO ADMIT COUNSEL PRO HAC VICE
	)
Petition for Investigation Into Long-Term Direct	)
Access Programs.	)
	)

Pursuant to UTCR 3.170 and OAR § 860-001-0320, the Alliance of Western Energy Consumers ("AWEC") moves to admit Curt R. Ledford, a member in good standing of the Nevada State Bar, as counsel *pro hac vice* before the Oregon Public Utility Commission in the above-captioned proceeding.

 $\label{eq:continuous} In \ support \ of \ this \ motion, \ AWEC \ has \ attached \ the \ Affidavit \ of \ Curt \ R. \ Ledford, \\ including \ Attachments \ A-C \ thereto.$ 

Dated this 27<sup>th</sup> day of January, 2022.

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

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#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### **UM 2024**

In the Matter of	)	
	)	AFFIDAVIT OF
ALLIANCE OF WESTERN ENERGY	)	CURT R. LEDFORD
CONSUMERS,	)	
	)	
Petition for Investigation Into Long-Term Dir	ect )	
Access Programs.	)	
	)	

### I, CURT R. LEDFORD, being first duly sworn on oath, depose and say:

- 1. My name is Curt R. Ledford. I am an active member in good standing of the State Bar of Nevada, and my Nevada State Bar No. is 9101. 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 Supreme Court as Attachment A.
- 2. If granted permission to practice before the Oregon Public Utility Commission ("Commission") in Docket No. UM 2024, I will associate in this matter with Corinne O. Milinovich, Oregon State Bar No. 194200. Ms. Milinovich, an associate 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 2024.
- 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 2021 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 27 day of January, 2022.

CURT R. LEDFORD

SUBSCRIBED AND SWORN to before me this 27 day of January, 2022.

ERNEST E. TREBIZO
NOTARY PUBLIC
STATE OF NEVADA
APPT. NO. 15-2769-1
MY APPT. EXPIRES AUGUST 20, 2023

Notary Public for Nevada

My Commission Expires: August 20, 2022

# State Bar of Nevada Certificate of Good Standing

IT IS HEREBY CERTIFIED that Curt R. Ledford,

Bar Number 9101 was admitted by the Supreme Court of the State of Nevada on

10/20/2004 as an Attorney and Counselor at Law duly licensed to practice in all courts of

the State of Nevada. It is further certified that Curt R. Ledford is now an

Active member of the State Bar of Nevada in good standing.

DATED Tuesday, January 04, 2022.

Vanessa Dalton

Member Services Administrator

State Bar of Nevada

		Affidavit of Curt R. Ledford
	)	Attachment B Page 1 of 1
In re: Curt R. Ledford	)	Certificate of Compliance
Name of Out-of-State Attorney	)	For <i>Pro Hac Vice</i> Admission
•	,	
I, Curt R. Ledford	_(print r	name), am an attorney in the State of Nevada
and I intend to seek <i>pro hac vice</i> admission in accordance with OR proceeding:	S 9.241	and UTCR 3.170 in the following Oregon court action or
Case Name: AWEC Petition for Investigation in	to Long	g-Term Direct Access Programs
Court: Oregon Public Utility Commission		Case No.: UM 2024
I certify that (check all that apply):		
I am an attorney in good standing in the State of Nevada certificate issued by the licensing authority in that state.		, as evidenced by the attached good standing
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 in another attachment to this certificate.  ✓ I intend to associate in the above-referenced action or proceeding 194200, an active member in good standing of the Oregomatical Intended	r jurisdic ng with _ gon State es of the ection of t offessiona ched cert o notify t iction. tting me any rease ac vice for emonths for me to	Corinne O. Milinovich, OSB No.  Bar, who will participate meaningfully in the matter.  State of Oregon; be familiar with and comply with the Oregon courts and Oregon State Bar with respect to all liability insurance substantially equivalent to the Oregon tificate of insurance coverage. The trial court promptly of any changes in my insurance pro hac vice in the above-referenced matter when such an on, I will promptly notify the Oregon State Bar. The ee established by ORS 9.241 and the rules of the Oregon from the date of the Acknowledgment of Receipt issued
Dated this 24th day of January , 2	20 22	
x /////	Ne	evada Bar No.: 9101
(Applicant Signature)		ome Jurisdiction)
		725 725 1719
Mailing Address: Davison Van Cleve, PC 300 S. 4th Street, Suite 1400	Pho FA	one: 725-735-1718 X: 503-241-8160
Las Vegas, NV 89101		nail: crl@dvclaw.com
Acknowledgme	ent 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 Dated this day of	knowledg nd the \$50 n the date	ge receipt from the above-named out-of-state attorney of the 00 fee for pro hac vice appearance in the above-referenced

UM 2024

Troy Wood, Regulatory Counsel

■ SEE MATERIALS ATTACHED:

UM 2024 Affidavit of Curt R. Ledford Attachment C Page 1 of 1



# 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 have ADDITIONAL INSURED provisions or 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).

	UCER				CONTAC NAME:				
RiskPoint Insurance Advisors LLC 5285 Meadows Rd Suite 242				PHONE (A/C, No, Ext): 971-282-4304 FAX (A/C, No): 503-327-8145					
	e Oswego OR 97035				E-MAIL ADDRESS: certificates@riskpointins.com				
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INI CE	DICATED. NOTWITHSTANDING ANY RE RTIFICATE MAY BE ISSUED OR MAY CLUSIONS AND CONDITIONS OF SUCH	QUIR PERT	EMENT, ' AIN, THE	TERM OR CONDITION INSURANCE AFFORD	OF ANY ED BY 1	CONTRACT	OR OTHER I	DOCUMENT WITH RESPECT	TO WHICH THIS
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	CLAIMS-MADE OCCUR							PREMISES (Ea occurrence) \$	
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}								PERSONAL & ADV INJURY \$	
}	GEN'L AGGREGATE LIMIT APPLIES PER:							GENERAL AGGREGATE \$	
	POLICY JECT LOC							PRODUCTS - COMP/OP AGG \$	
	OTHER:							COMBINED SINGLE LIMIT &	
	AUTOMOBILE LIABILITY							(Ea accident)	
	ANY AUTO OWNED SCHEDULED							BODILY INJURY (Per person) \$	
	AUTOS ONLY AUTOS							BODILY INJURY (Per accident) \$ PROPERTY DAMAGE	
	HIRED NON-OWNED AUTOS ONLY							(Per accident) \$	
								\$	
	UMBRELLA LIAB OCCUR							EACH OCCURRENCE \$	
	EXCESS LIAB CLAIMS-MADE							AGGREGATE \$	
	DED RETENTION\$							\$	
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY							PER OTH- STATUTE ER	
	ANYPROPRIETOR/PARTNER/EXECUTIVE	N/A						E.L. EACH ACCIDENT \$	
	OFFICER/MEMBEREXCLUDED? (Mandatory in NH)	N/A						E.L. DISEASE - EA EMPLOYEE \$	
	If yes, describe under DESCRIPTION OF OPERATIONS below							E.L. DISEASE - POLICY LIMIT \$	
Α	Professional Liability		LPE	E 9044565 00		1/1/2022	1/1/2023	Per claim	\$1,000,000
								Aggregate Limit	\$1,000,000
DESC	RIPTION OF OPERATIONS / LOCATIONS / VEHIC	LES (A	CORD 101,	Additional Remarks Schedu	le, may be	attached if more	e space is require	gd)	
CEF	TIFICATE HOLDER				CANC	ELLATION			
	Curt Ledford 1750 SW Harbor Way Suit	e 45(	)		THE ACC	EXPIRATION ORDANCE WI	N DATE THE	ESCRIBED POLICIES BE CAN REOF, NOTICE WILL BE Y PROVISIONS.	
1750 SW Harbor Way Suite 450 Portland OR 97201					AUTHORIZED REPRESENTATIVE  BSS				
	·				-	ტ 10	88-2015 AC	ORD CORPORATION A	I righte recerved