



December 16, 2014

**Via Electronic Filing and FedEx**

Public Utility Commission  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
Salem, OR 97308

Re: Docket No. LC 62: Motion of Sierra Club for Gloria D. Smith, Travis Ritchie, and Andrea Issod to Appear Pro Hac Vice

Please find enclosed the original and one (1) copy of the Motion of Sierra Club for Gloria D. Smith, Travis Ritchie, and Andrea Issod to Appear Pro Hac Vice in the above-referenced docket. This document has been e-filed with the Commission and served on parties via email.

Please let me know if you have any questions. Thank you.

Respectfully submitted,

*/s/ Derek Nelson*

---

Derek Nelson  
Legal Assistant  
Sierra Club Environmental Law Program  
85 Second St., 2nd Floor  
San Francisco, CA 94105  
(415) 977-5595  
derek.nelson@sierraclub.org

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 62

In the Matter of  
PACIFICORP, dba PACIFIC POWER,  
2015 Integrated Resource Plan.

MOTION BY SIERRA CLUB FOR  
GLORIA D. SMITH, TRAVIS RITCHIE,  
AND ANDREA ISSOD TO APPEAR  
PRO HAC VICE

In accordance with OAR 860-001-0320 and UTCR 3.170(1), Sierra Club hereby moves the Public Utility Commission of Oregon to admit Gloria D. Smith, Travis Ritchie, and Andrea Issod to appear *pro hac vice* on behalf of intervenor Sierra Club in the above captioned proceeding. Ms. Smith, Mr. Ritchie, and Ms. Issod have associated with Joshua Smith, an attorney licensed to practice law and in good standing in the State of Oregon (Oregon Bar No. 071757) as co-counsel for this proceeding.

Attached hereto are (3) certificates of compliance for *pro hac vice* admission for Ms. Smith, Mr. Ritchie, and Ms. Issod, and (3) certificates of the clerk of the Supreme Court of California indicating that Ms. Smith, Mr. Ritchie, and Ms. Issod are admitted to practice law in California and are in good standing.

Ms. Smith, Mr. Ritchie, and Ms. Issod are full time employees of the Sierra Club, which is a non-profit corporation. UTCR 3.170(1) therefore does not require counsel to provide a certificate of professional liability insurance for admission *pro hac vice* because they will not be engaged in the private practice of law. UTCR 3.170(1)(e) ("If the attorney will engage in the private practice of law in this state provide a certificate of insurance covering the attorney's activities in this state and providing professional liability insurance substantially equivalent to

the Oregon State Bar Professional Liability Fund plan."); ORS 9.08(2)(b) ("For purposes of paragraph (a) [establishing authority to require professional liability insurance], an attorney is not engaged in the private practice of law if the attorney is a full-time employee of a corporation...")

WHEREFORE Sierra Club respectfully requests that the Commission grant admission *pro hac vice* to Gloria D. Smith, Travis Ritchie, and Andrea Issod for this proceeding.

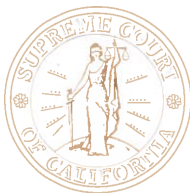
Dated: December 16, 2014

Respectfully submitted,

/s/ Joshua Smith

Joshua Smith  
Staff Attorney  
Sierra Club Environmental Law Program  
85 Second Street, 2nd Floor  
San Francisco, CA 94105  
(415)977-5560  
(415)977-5793 (fax)  
[joshua.smith@sierraclub.org](mailto:joshua.smith@sierraclub.org)

*Attorney for Sierra Club*



# Supreme Court of California

FRANK A. McGUIRE

*Court Administrator and Clerk of the Supreme Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

**GLORIA DIANTHA SMITH**

*I, FRANK A. McGUIRE, Clerk of the Supreme Court of the State of California, do hereby certify that GLORIA DIANTHA SMITH was on the 2nd day of June, 1999, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 16th day of December, 2014.*

FRANK A. McGUIRE

*Clerk of the Supreme Court*

By: \_\_\_\_\_

A handwritten signature in blue ink, appearing to be "CC", written over a horizontal line.

*Charles Cahoon, Deputy Clerk*

In re: Gloria D. Smith  
Name of Out-of-State Attorney )

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

I, Gloria D. Smith (print name), am an attorney in the State of California  
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: In the Matter of PACIFICORP, dba PACIFIC POWER's 2015 Integrated Resource Plan.

Court: Public Utility Commission of Oregon Case No.: LC 62

I certify that (check all that apply):

- I am an attorney in good standing in the State of California, 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 Joshua Douglas Smith, OSB No. 071757, 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 15th day of December, 20 14.

**X**   
(Applicant Signature)

CA District 1 Bar No.: 200824  
(Home Jurisdiction)

Mailing Address: Gloria Smith, Sierra Club Environmental Law Program  
85 Second Street, 2nd Floor  
San Francisco, CA 94105

Phone: 415-977-5532  
FAX: 415-977-5793  
Email: gloria.smith@sierraclub.org

**Acknowledgment of Receipt**

As Regulatory Services Counsel 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:

\_\_\_\_\_  
Regulatory Services Counsel



# Supreme Court of California

FRANK A. McGUIRE

*Court Administrator and Clerk of the Supreme Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

**TRAVIS MICHAEL RITCHIE**

*I, FRANK A. McGUIRE, Clerk of the Supreme Court of the State of California, do hereby certify that TRAVIS MICHAEL RITCHIE was on the 2nd day of December, 2008, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 16th day of December, 2014.*

FRANK A. McGUIRE

*Clerk of the Supreme Court*

By: \_\_\_\_\_

A handwritten signature in blue ink, appearing to read "Cahoon", written over a horizontal line.

*Charles Cahoon, Deputy Clerk*

In re: Travis Ritchie  
Name of Out-of-State Attorney )

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

I, Travis Ritchie (print name), am an attorney in the State of California  
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:

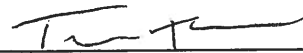
Case Name: In the Matter of PACIFICORP, dba PACIFIC POWER's 2015 Integrated Resource Plan.

Court: Public Utility Commission of Oregon Case No.: LC 62

I certify that (check all that apply):

- I am an attorney in good standing in the State of California, 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 Joshua Douglas Smith, OSB No. 071757, 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 15th day of December, 20 14.

X   
(Applicant Signature)

CA District 1 Bar No.: 258084  
(Home Jurisdiction)

Mailing Address: Travis Ritchie, Sierra Club Environmental Law Program  
85 Second Street, 2nd Floor  
San Francisco, CA 94105

Phone: 415-977-5727  
FAX: 415-977-5793  
Email: travis.ritchie@sierraclub.org

**Acknowledgment of Receipt**

As Regulatory Services Counsel 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:

\_\_\_\_\_  
Regulatory Services Counsel



# Supreme Court of California

FRANK A. McGUIRE

*Court Administrator and Clerk of the Supreme Court*

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT  
OF THE  
STATE OF CALIFORNIA**

**ANDREA S. ISSOD**

*I, FRANK A. McGUIRE, Clerk of the Supreme Court of the State of California, do hereby certify that ANDREA S. ISSOD was on the 1st day of June, 2004, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 16th day of December, 2014.*

FRANK A. McGUIRE \_\_\_\_\_

*Clerk of the Supreme Court*

By: \_\_\_\_\_

A handwritten signature in blue ink, appearing to read "Cahoon", written over a horizontal line.

*Charles Cahoon, Deputy Clerk*



In re: Andrea Issod  
Name of Out-of-State Attorney

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

I, Andrea Issod (print name), am an attorney in the State of California  
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: In the Matter of PACIFICORP, dba PACIFIC POWER's 2015 Integrated Resource Plan.

Court: Public Utility Commission of Oregon Case No.: LC 62

I certify that (check all that apply):

- I am an attorney in good standing in the State of California, 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 Joshua Douglas Smith, OSB No. 071757, 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 15th day of December, 20 14.

**X**   
(Applicant Signature)

CA District 1 \_\_\_\_\_ Bar No.: 230920  
(Home Jurisdiction)

Mailing Address: Andrea Issod Sierra Club Environmental Law Program  
85 Second Street, 2nd Floor  
San Francisco, CA 94105

Phone: 415-977-5544  
FAX: 415-977-5793  
Email: andrea.issod@sierraclub.org

**Acknowledgment of Receipt**

As Regulatory Services Counsel 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:

\_\_\_\_\_  
Regulatory Services Counsel

## CERTIFICATE OF SERVICE

I hereby certify that on this 16<sup>th</sup> day of December, 2014, I caused to be served the foregoing MOTION BY SIERRA CLUB FOR GLORIA D. SMITH, TRAVIS RITCHIE, AND ANDREA ISSOD TO APPEAR PRO HAC VICE upon all party representatives on the official service list for this proceeding via electronic mail.

**Dustin T. Till (C)**  
Pacific Power  
825 NE MULTNOMAH ST, STE 1800  
PORTLAND OR 97232  
dustin.till@pacificorp.com  
**Waive Paper Service**

**Megan Walseth Decker (C)**  
**Michael O'Brien (C)**  
**RNP Dockets**  
Renewable Northwest Project  
421 SW 6TH AVE #1125  
PORTLAND OR 97204  
megan@renewablenw.org  
michael@renewablenw.org  
dockets@renewablenw.org  
**Waive Paper Service**

**Kacia Brockman (C)**  
**Phil Carver (C)**  
Oregon Department of Energy  
625 MARION ST NE  
SALEM OR 97301  
kacia.brockman@state.or.us  
phil.carver@state.or.us  
**Waive Paper Service**

**Renee M. France (C)**  
Oregon Department of Justice  
Natural Resources Section  
1162 COURT ST NE  
SALEM OR 97301-4096  
renee.m.france@doj.state.or.us  
**Waive Paper Service**

**Robert Jenks (C)**  
**G. Catriona McCracken (C)**  
**OPUC Dockets**  
Citizens' Utility Board of Oregon  
610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
bob@oregoncub.org  
catriona@oregoncub.org  
dockets@oregoncub.org  
**Waive Paper Service**

**Melinda J Davison (C)**  
**Jesse E Cowell (C)**  
Davison Van Cleve  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
mjd@dvclaw.com  
jec@dvclaw.com  
**Waive Paper Service**

**Colin McConnaha (C)**  
Department Of Environmental Quality  
811 SW SIXTH AVE  
PORTLAND OR 97204  
colin.mcconnaha@state.or.us  
**Waive Paper Service**

**Bradley Mullins (C)**  
Mountain West Analytics  
333 SW TAYLOR STE 400  
PORTLAND OR 97204  
brmullins@mwanalytics.com  
**Waive Paper Service**

**Wendy Gerlitz (C)**  
NW Energy Coalition  
1205 SE FLAVEL  
PORTLAND OR 97202  
wendy@nwenergy.org  
**Waive Paper Service**

**Paul Garrahan (C)**  
Oregon Department of Justice  
1162 COURT ST NE  
SALEM OR 97301-4096  
paul.garrahan@doj.state.or.us  
**Waive Paper Service**

**Fred Heutte**  
NW Energy Coalition  
PO BOX 40308  
PORTLAND OR 97240-0308  
fred@nwenergy.org  
**Waive Paper Service**

**Franco Albi (C)**  
**V. Denise Saunders (C)**  
**Patrick G. Hager**  
Portland General Electric  
121 SW SALMON ST 1WTC0702  
PORTLAND OR 97204  
franco.albi@pgn.com  
denise.saunders@pgn.com  
patrick.hager@pgn.com  
pge.opuc.filings@pgn.com  
**Waive Paper Service**

Dated this 16<sup>th</sup> day of December, 2014 at San Francisco, CA.

*/s/ Derek Nelson*

---

Derek Nelson  
Legal Assistant  
Sierra Club Environmental Law Program  
85 Second St., 2<sup>nd</sup> Floor  
San Francisco, CA 94105  
(415) 977-5595  
derek.nelson@sierraclub.org