

II

# CABLE HUSTON<sub>LLP</sub>

RICHARD G. LORENZ

[rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)  
[www.cablehuston.com](http://www.cablehuston.com)

June 2, 2014

**VIA ELECTRONIC FILING & US MAIL**

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
PO Box 2148  
Salem, OR 97308-2148

Re: In the Matter of the Complaint of THREEMILE CANYON WIND I, LLC  
against PACIFICORP, dba PACIFIC POWER, Pursuant to ORS 756.500.  
**Docket No. UM-1546**

Dear Filing Center:

Enclosed please find the original and one copy of the Motion to Appear *Pro Hac Vice* on behalf of Threemile Canyon Wind I, LLC in the above-referenced docket.

Thank you for your assistance with this matter. Should you have any questions, please call.

Very truly yours,



Richard G. Lorenz

RGL:sk  
Enclosure  
cc: UM-1546 Service List

4830-2860-6235

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1546**

THREEMILE CANYON WIND, LLC	)	
	)	MOTION TO APPEAR
Complainant,	)	PRO HAC VICE
	)	
vs.	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	
	)	
Defendant.	)	

In accordance with OAR 860-001-0320 and UTCR 3.170, the undersigned attorneys, members in good standing of the District of Columbia Bar, file this motion to appear *pro hac vice* in the above-referenced proceeding. In support of this motion, the undersigned attorneys state as follows:

The undersigned request permission to appear *pro hac vice* in this proceeding as co-counsel for Threemile Canyon Wind I, LLC which is the Complainant in this proceeding. In compliance with OAR 860-001-0320(2), the undersigned have attached the following information:

1. Certificates of Compliance for pro hac vice admission;
2. Certificates of good standing from the District of Columbia Bar; and
3. Certificate of liability insurance.

In compliance with OAR 860-001-0320(3), the undersigned has associated with a member in good standing of the Oregon State Bar who intends to participate meaningfully in this matter. The member in good standing of the Oregon State Bar is:

Richard G. Lorenz, OSB No. 003086  
Chad M. Stokes, OSB No. 004007  
Cable Huston LLP  
1001 SW Fifth Avenue, Suite 2000  
Portland, OR 97204-1136  
(503) 224-3092 (Telephone)  
(503) 224-3176 (Fax)  
rlorenz@cablehuston.com

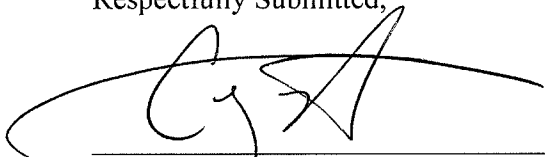
In accordance with UTCR 3.170 (1)(b), the undersigned certify that they are not subject to pending disciplinary proceedings in any other jurisdiction. In accordance with UTCR 3.170(1)(d), the undersigned certify that they will: comply with applicable statutes, laws, and procedural rules of the state 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 the Oregon State Bar with respect to acts and omissions occurring during the undersigned attorneys' admission under this rule.

Finally, in accordance with UTCR 3.170(1)(f), the undersigned agree to notify this Commission promptly of any changes in their insurance or status.

Based on the foregoing, the undersigned attorneys respectfully request that the Commission grant this motion to appear *pro hac vice* in this proceeding.

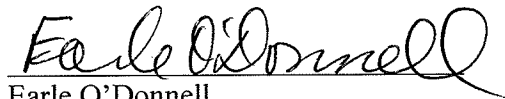
June 2, 2014

Respectfully Submitted,



Corey Neal  
DC Bar No. 1007803

White & Case LLP  
701 Thirteenth Street, NW  
Washington, DC 20005-3807  
Tel: 1-202-626-3600  
cneal@whitecase.com  
Counsel to  
Threemile Canyon Wind I, LLC



Earle O'Donnell  
DC Bar No. 929489

White & Case LLP  
701 Thirteenth Street, NW  
Washington, DC 20005-3807  
Tel: 1-202-626-3600  
eodonnell@whitecase.com  
Counsel to  
Threemile Canyon Wind I, LLC

In re: Earle H. O'Donnell  
Name of Out-of-State Attorney

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

I, Earle H. O'Donnell (print name), am an attorney in the State of District of Columbia 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: Threemile Canyon Wind I, LLC v. PacifiCorp, dba Pacific Power  
Court: Public Utility Commission of Oregon Case No.: UM 1546

I certify that (check all that apply):

- I am an attorney in good standing in the State of District of Columbia, 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 Richard Lorenz, OSB No. 003086, 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 \$250 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 \$250 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 2nd day of June, 2014.

X Earle O'Donnell  
(Applicant Signature)

Mailing Address: White & Case  
701 Thirteenth Street NW  
Washington, DC 20009

District of Columbia Bar No.: 929489  
(Home Jurisdiction)  
Phone: (202) 626-3582  
FAX: (202) 639-9355  
Email: eodonnell@whitecase.com

**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 \$250 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



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

**EARLE H. O'DONNELL**

*was on JUNE 10, 1977, duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

*In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 30, 2014 .*

JULIO A. CASTILLO  
Clerk of the Court

By: *Brenda R. Hancock*  
Deputy Clerk



## Summary of Insurance Contract

We, the undersigned Insurance Brokers, hereby verify that CNA Insurance Company Limited and Various Insurance Companies have issued the following described insurance, each for their own part and not one for the other, and which is in force as of the date hereof:

**Sent to:** Evidence of Insurance

**Re:** White & Case LLP's Washington D. C. Office / Earle O'Donnell

**Type of Insurance:** Professional Indemnity Insurance

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**Name of Assured:** White & Case LLP (including White & Case LLP's Washington, D.C Office / Earle O'Donnell) and others, as more fully described in the Primary Policy Wording

**Policy No.:** QB1300343

**Insurer:** CNA Insurance Company Limited and Various Insurance Companies

**Period:** 12:01 a.m. October 1, 2013 to 12:01 a.m. October 1, 2014

**Limit:** In excess of \$1,000,000 per claim (Limits shown are as requested)

**Geographical Limitation:** Worldwide Coverage

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Subject to the terms, conditions, exclusions and limitations of the Policy(ies).

This document is furnished as a matter of information only. The issuance of this document does not make the person or organization to whom it is issued an additional Assured, nor does it modify in any manner the contract of insurance between the Assured and the Insurers. Any amendment, change or extension of such contract can only be effected by specific endorsement attached thereto.

*Aon Risk Services Northeast, Inc.*

**Date:** June 2, 2014

In re: Corey N. Neal  
Name of Out-of-State Attorney

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


I, Corey N. Neal (print name), am an attorney in the State of District of Columbia 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: Threemile Canyon Wind I, LLC v. PacifiCorp, dba Pacific Power  
Court: Public Utility Commission of Oregon Case No.: UM 1546

I certify that (check all that apply):

- I am an attorney in good standing in the State of District of Columbia, 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 Richard Lorenz, OSB No. 003086, 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 \$250 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 \$250 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 2nd day of June, 2014.

X   
(Applicant Signature)

Mailing Address: White & Case  
701 Thirteenth Street NW  
Washington, DC 20009

District of Columbia Bar No.: 1007803

(Home Jurisdiction)

Phone: (202) 637-6195

FAX: (202) 639-9355

Email: cneal@whitecase.com

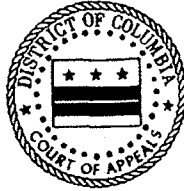
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Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

SEE MATERIALS ATTACHED:

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



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

**COREY N. NEAL**

*was on JUNE 4, 2012, duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

*In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C, on May 30, 2014 .*

JULIO A. CASTILLO  
Clerk of the Court

By: *Blandine A. Hancock*  
Deputy Clerk





## Summary of Insurance Contract

We, the undersigned Insurance Brokers, hereby verify that CNA Insurance Company Limited and Various Insurance Companies have issued the following described insurance, each for their own part and not one for the other, and which is in force as of the date hereof:

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**Re:** White & Case LLP's Washington D. C. Office / Earle O'Donnell  
**Type of Insurance:** Professional Indemnity Insurance

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**Name of Assured:** White & Case LLP (including White & Case LLP's Washington, D.C Office / Earle O'Donnell) and others, as more fully described in the Primary Policy Wording  
**Policy No.:** QB1300343  
**Insurer:** CNA Insurance Company Limited and Various Insurance Companies  
**Period:** 12:01 a.m. October 1, 2013 to 12:01 a.m. October 1, 2014  
**Limit:** In excess of \$1,000,000 per claim (Limits shown are as requested)  
**Geographical Limitation:** Worldwide Coverage

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Subject to the terms, conditions, exclusions and limitations of the Policy(ies).

This document is furnished as a matter of information only. The issuance of this document does not make the person or organization to whom it is issued an additional Assured, nor does it modify in any manner the contract of insurance between the Assured and the Insurers. Any amendment, change or extension of such contract can only be effected by specific endorsement attached thereto.

*Aon Risk Services Northeast, Inc.*

**Date:** June 2, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served the foregoing **MOTION TO APPEAR *PRO HAC VICE*** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

**PACIFICORP**

Etta Lockey  
Associate Counsel  
825 NE Multnomah St., Ste 1800  
Portland, OR 97232  
[Etta.lockey@pacificorp.com](mailto:Etta.lockey@pacificorp.com)

**PUBLIC UTILITY COMMISSION OF OREGON**

Brittany Andrus  
Adam Bless  
P.O. Box 2148  
Salem, OR 97308-2148  
[Brittany.andrus@state.or.us](mailto:Brittany.andrus@state.or.us)  
[Adam.bless@state.or.us](mailto:Adam.bless@state.or.us)

**EXELON BUSINESS SERVICES**

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Baltimore, MD 21202  
[Paul.ackerman@constellation.com](mailto:Paul.ackerman@constellation.com)

**PACIFICORP, DBA PACIFIC POWER**

Oregon Dockets  
825 NE Multnomah St., Ste. 2000  
Portland, OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

Dated in Portland, Oregon, this 2<sup>nd</sup> day of June, 2014.

/s/ Richard Lorenz

Richard Lorenz, OSB No. 003086  
Chad M. Stokes, OSB No. 004007  
Cable Huston LLP  
1001 SW Fifth Avenue, Suite 2000  
Portland, OR 97204-1136  
(503) 224-3092 (Telephone)  
(503) 224-3176 (Fax)  
[rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)

Of Attorneys for the  
Threemile Canyon Wind I, LLC