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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: UM 1751 Implementing Energy Storage Program Guidelines  
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 Sky C. Stanfield and the accompanying Certificate of Service, to be electronically filed, June 22, 2016.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Amy Zehring, Secretary

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF OREGON**

UM 1751

In the Matter of

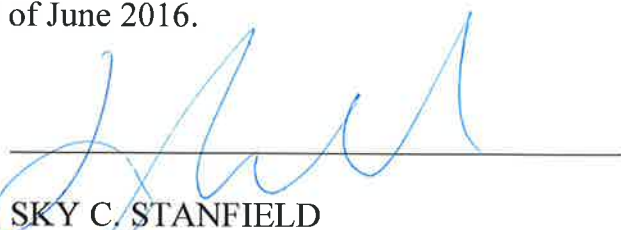
PUBLIC UTILITY COMMISSION OF  
OREGON,

Implementing Energy Storage Program  
Guidelines pursuant to House Bill 2193.

MOTION FOR ADMISSION  
PRO HAC VICE

Pursuant to UTCR 3.170, I, Sky C. Stanfield 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 Sky C. Stanfield and the Certificate of Standing from the State Bar of California.

Respectfully submitted this 21 day of June 2016.



SKY C. STANFIELD  
SHUTE, MIHALY & WEINBERGER LLP  
396 Hayes Street  
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Telephone: (415) 552-7272  
Facsimile: (415) 552-5816  
Email: stanfield@smwlaw.com  
CA State Bar No. 244966

Attorney for: INTERSTATE  
RENEWABLE ENERGY COUNCIL, INC.

**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.

AFFIDAVIT OF SKY C. STANFIELD

STATE OF CALIFORNIA            )  
COUNTY OF SAN FRANCISCO    ) ss:  
  )

Sky C. Stanfield, being duly sworn, deposes and states that the following is true to her personal knowledge and belief:

1. Sky C. Stanfield counsel for the Interstate Renewable Energy Council, Inc. certifies that she is not subject to pending disciplinary proceedings in any other jurisdiction.
2. Sky C. Stanfield will associate with Elisabeth Holmes, an attorney licensed to practice law in the State of Oregon, who will participate meaningfully in the above-referenced matter.

Ms. Holmes's contact information is below and she should be added to the Commission's

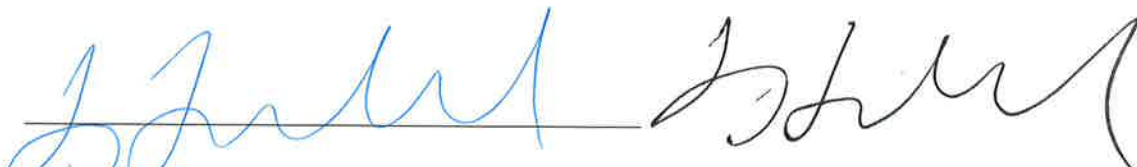
Certificate of Service.

Elisabeth Holmes, OR Bar No. 120254  
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Email: eli.blueriverlaw@gmail.com

3. Sky C. Stanfield will comply with all applicable statutes, laws 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

  
\_\_\_\_\_  
SKY C. STANFIELD

Subscribed and sworn before me this 22 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 San Francisco  
Subscribed and sworn to (or affirmed) before me on this 22 day of June  
2016 by Sky Cedar Stanfield

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



\_\_\_\_\_  
Notary Public, State of California

My commission expires \_\_\_\_\_

794895.1





# THE STATE BAR OF CALIFORNIA

MEMBER RECORDS & COMPLIANCE

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

June 20, 2016

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SKY CEDAR PEACOCK STANFIELD, #244966 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2006; 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

  
Kathan Lambert  
Custodian of Membership Records



In re: Sky C. Stanfield  
Name of Out-of-State Attorney )

Certificate of Compliance  
For Pro Hac Vice Admission

I, Sky C. Stanfield (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: Implementing Energy Storage Program Guidelines pursuant to House Bill 2193

Court: Public Utility Commission of Oregon Case No.: UM 1751

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 Elisabeth Holmes, OSB No. 120254, 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 June, 2016.

X

(Applicant Signature)

California Bar No.: 244966  
(Home Jurisdiction)

Mailing Address: Shute, Mihaly & Weinberger LLP  
396 Hayes Street  
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### 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

**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.

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*/s/ Amy Zehring*  
\_\_\_\_\_  
Amy Zehring