

SHUTE, MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

AMY ZEHRING
Legal Secretary
zehring@smwlaw.com

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 Joseph D. Petta and the accompanying Certificate of Service, to be electronically filed, June 21, 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, Joseph D. Petta 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 Joseph D. Petta and the Certificate of Standing from the State Bar of California.

Respectfully submitted this 21 day of June 2016.



JOSEPH D. PETTA
SHUTE, MIHALY & WEINBERGER LLP
396 Hayes Street
San Francisco, California 94102
Telephone: (415) 552-7272
Facsimile: (415) 552-5816
Email: petta@smwlaw.com
CA State Bar No. 286665

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 JOSEPH D. PETTA

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

Joseph D. Petta, being duly sworn, deposes and states that the following is true to his personal knowledge and belief:


1. Joseph D. Petta counsel for the Interstate Renewable Energy Council, Inc. certifies that he is not subject to pending disciplinary proceedings in any other jurisdiction.
2. Joseph D. Petta will associate with Elisabeth Holmes, an attorney licensed to practice law in the State of Oregon, 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
Blue River Law, P.C.
P.O. Box 293
Eugene, Oregon 97440
Tel. (541) 870-7722
Email: eli.blueriverlaw@gmail.com

3. Joseph D. Petta will comply with all applicable statutes, law 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



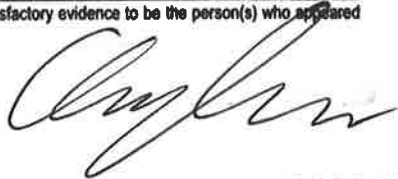
JOSEPH D. PETTA

Subscribed and sworn before me this _____ 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 Joseph David Petta

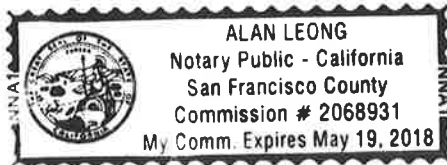
proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Notary Public, State of California

My commission expires _____

794513.1





THE STATE BAR OF CALIFORNIA

MEMBER RECORDS & COMPLIANCE

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

June 16, 2016

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JOSEPH DAVID PETTA, #286665 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 2012; 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

Louise Turner
Custodian of Membership Records

In re: Joseph D. Petta
Name of Out-of-State Attorney)

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

I, Joseph D. Petta (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, 20 16.

X 
(Applicant Signature)

California Bar No.: 286665
(Home Jurisdiction)

Mailing Address: Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102

Phone: 415-552-7272
FAX: 415-552-5816
Email: petta@smwlaw.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

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.

CITIZENS UTILITY BOARD OF OREGON

MICHAEL GOETZ
CITIZENS' UTILITY BOARD OF OREGON

610 SW BROADWAY STE 400
PORTLAND OR 97206
mike@oregoncub.org

ROBERT JENKS
CITIZENS' UTILITY BOARD OF OREGON

610 SW BROADWAY, STE 400
PORTLAND OR 97205
bob@oregoncub.org

CREA UM 1751

GREGORY M. ADAMS
RICHARDSON ADAMS, PLLC

PO BOX 7218
BOISE ID 83702
greg@richardsonadams.com

BRIAN SKEAHAN
CREA

PMB 409
18160 COTTONWOOD RD
SUNRIVER OR 97707
brian.skeahan@yahoo.com

ENERGY FREEDOM COALITION

KEVIN T FOX
KEYES FOX & WIEDMAN LLP

1580 LINCOLN ST, STE 880
DENVER CO 80203
kfox@kfwlaw.com

MEREDITH A ROBERTS
SOLARCITY

575 7TH ST NW STE 400
WASHINGTON DC 20004
mroberts2@solarcity.com

ENERGY STORAGE ASSOCIATION

JASON BURWEN
ENERGY STORAGE ASSOCIATION

1800 M STREET NW, STE 400S
WASHINGTON DC 20036
j.burwen@energystorage.org

JEFF CRAMER
38 NORTH SOLUTIONS

1536 WYNKOOP ST, STE 423
DENVER CO 80218
jeff@38northsolutions.com

ICNU UM 1751

TYLER C PEPPE
DAVISON VAN CLEVE, PC

333 SW TAYLOR SUITE 400
PORTLAND OR 97204
tcp@dvclaw.com

INTERSTATE RENEWABLE ENERGY COUNCIL

SARA BALDWIN AUCK
INTERSTATE RENEWABLE ENERGY COUNCIL INC

PÓ BOX 1156
LATHAM NY 12110-1156
sarab@irecusa.org

JOSEPH PETTA
SHUTE, MIHALY & WEINBERGER LLP

396 HAYES ST
SAN FRANCISCO CA 94102
petta@smwlaw.com

SKY STANFIELD
SHUTE, MIHALY & WEINBERGER LLP

296 HAYES ST
SAN FRANCISCO CA 94102
stanfield@smwlaw.com

JOINT DISTRIBUTED RESOURCE PARTIES

MELANIE GILLETTE
ENERNOC, INC

ONE MARINA PARK DR, SUITE
400
BOSTON MA 02210
mgillette@enernoc.com

KEN NICHOLS
EQL ENERGY - JOINT DISTRIBUTED RESOURCE PARTIES

3701 SE MILWAUKIE
PORTLAND OR 97202
ken@eqleenergy.com

NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITIO

CARL FINK
BLUE PLANET ENERGY LAW LLC

628 SW CHESTNUT ST, STE
200
PORTLAND OR 97219
cmfink@blueplanetlaw.com

ROBERT D KAHN
NORTHWEST & INTERMOUNTAIN POWER PRODUCERS COALITION

PO BOX 504
MERCER ISLAND WA 98040
rkahn@nipcc.org

NORTHWEST HYDROELECTRIC ASSOCIATION

JAN LEE
NORTHWEST HYDROELECTRIC ASSOCIATION

PO BOX 2517
CLACKAMAS OR 97015
jan@nwhydro.org

NW ENERGY COALITION

FRED HEUTTE
NW ENERGY COALITION

PO BOX 40308
PORTLAND OR 97240-0308
fred@nwenergy.org

OREGON DEPARTMENT OF ENERGY

DIANE BROAD
*OREGON DEPARTMENT OF ENERGY

625 MARION ST NE
SALEM OR 97301-3737
diane.broad@state.or.us

RENEE M FRANCE
*OREGON DEPARTMENT OF JUSTICE

NATURAL RESOURCES
SECTION
1162 COURT ST NE
SALEM OR 97301-4096
renee.m.france@doj.state.or.us

WENDY SIMONS
*OREGON DEPARTMENT OF ENERGY

625 MARION ST NE
SALEM OR 97301
wendy.simons@state.or.us

OSEIA UM 1751

JEFF BISSONNETTE
OREGON SOLAR ENERGY INDUSTRIES ASSOCIATION

PO BOX 14927
PORTLAND OR 97293-0927
jeff@oseia.org

PACIFICORP UM 1751

PACIFICORP, DBA PACIFIC POWER

825 NE MULTNOMAH ST, STE
2000
PORTLAND OR 97232
oregondockets@pacificorp.com

DUSTIN T TILL
PACIFIC POWER

825 NE MULTNOMAH ST STE
1800
PORTLAND OR 97232
dustin.till@pacificorp.com

PORTLAND GENERAL ELECTRIC FOR UM 1751

PGE RATES & REGULATORY AFFAIRS

PORTLAND GENERAL ELECTRIC
COMPANY
121 SW SALMON STREET,
1WTC0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

JOSEPH ROSS
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST
3WTC0306
PORTLAND OR 97204
joseph.ross@pgn.com

V. DENISE SAUNDERS
PORTLAND GENERAL ELECTRIC

121 SW SALMON ST
1WTC1301
PORTLAND OR 97204
denise.saunders@pgn.com

RENEWABLE ENERGY SYSTEMS AMERICAS INC

JOHN FERNANDES
RENEWABLE ENERGY SYSTEMS AMERICAS INC

11101 WEST 120TH AVE
BROOMFIELD CO 80021
john.fernandes@res-
americas.com

BRIAN SCHNALL
RENEWABLE ENERGY SYSTEMS AMERICAS INC

11101 WEST 120TH AVE
BROOMFIELD CO 80021
brian.schnall@res-
americas.com

RENEWABLE NORTHWEST UM 1751

RENEWABLE NORTHWEST

421 SW 6TH AVE., STE. 1125
PORTLAND OR 97204
dockets@renewablenw.org

SILVIA TANNER
RENEWABLE NORTHWEST

421 SW 6TH AVE, STE 1125
PORTLAND OR 97204
silvia@renewablenw.org

CAMERON YOURKOWSKI
RENEWABLE NORTHWEST PROJECT

421 SW 6TH AVE, SUITE 1125
PORTLAND OR 97205
cameron@rnp.org

SBUA

LOLLY ANDERSON
CLEANTECH LAW PARTNERS, PC

1724 SE TAYLOR ST
PORTLAND OR 97214
landerson@cleantechlaw.com

JAMES BIRKELUND
SMALL BUSINESS UTILITY ADVOCATES

548 MARKET ST STE 11200
SAN FRANCISCO CA 94104
james@utilityadvocates.org

DIANE HENKELS
CLEANTECH LAW PARTNERS PC

420 SW WASHINGTON ST STE
400
PORTLAND OR 97204
dhenkels@cleantechlaw.com

STAFF UM 1751

STEPHANIE S ANDRUS
PUC STAFF--DEPARTMENT OF JUSTICE

BUSINESS ACTIVITIES
SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

JOHN CRIDER
PUBLIC UTILITY COMMISSION OF OREGON

PO BOX 1088
SALEM OR 97308-1088
john.crider@state.or.us

ELANIE PRAUSE
PUBLIC UTILITY COMMISSION OF OREGON

3930 FAIRVIEW INDUSTRIAL
DR SE
SALEM OR 97302
elaine.prause@state.or.us

SUNVERGE

CAMERON BROOKS
SUNVERGE ENERGY

950 MINNA ST.
SAN FRANCISCO CA 94103
cbrooks@sunverge.com

JON FORTUNE
SUNVERGE

950 MINNA ST
SAN FRANCISCO OR 94103
jfortune@sunverge.com

/s/ Amy Zehring

Amy Zehring