ROBERT GUILD
Attorney at Law
314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419 • bguild@mindspring.com

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BY ELECTRONIC FILING AND SERVICE

July 9, 2020

Ms. Jocelyn D. Boyd
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

In re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated
Docket No. 2019-226-E

Dear Ms. Boyd:

Enclosed please find for filing and consideration in the above docket the Motion for Admission Pro Hac Vice for Dorothy E. Jaffe, Esquire, on behalf of Sierra Club, together with Docket Cover Sheet and Certificate of Service. These documents were submitted for e-filing to the Commission's Docket Management System on April 8, 2020; but the electronic files apparently could not be opened at that time. Upon inquiry to the Supreme Court Clerk's office I am informed that they did receive their copy of these papers, including the proper filing fee, and acknowledged their completeness by letter to the Commission on or about April 10, 2020.

Thank you very much for your courtesy and usual helpfulness in facilitating the consideration of this matter. Please let me know if I need to provide any further information to support this motion.

With kind regards I am

Sincerely,

Robert Guild

Encls.

CC: All Parties

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STATE OF SOUTH CAROLINA

(Caption of Case)

In re:

South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2019 - 226 - E

(Please type or print)
Submitted by: Robert Guild

Address: 314 Pall Mall St.
Columbia, SC 29201

SC Bar Number: 0002358
Telephone: (803) 917 573
Fax:
Other:
Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition**

☒ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:**

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
☒ Electric	☐ Affidavit	☐ Letter	☐ Request
☐ Electric/Gas	☐ Agreement	☐ Memorandum	☐ Request for Certification
☐ Electric/Telecommunications	☐ Answer	☒ Motion	☐ Request for Investigation
☐ Electric/Water	☐ Appellate Review	☐ Objection	☐ Resale Agreement
☐ Electric/Water/Telecom.	☐ Application	☐ Petition	☐ Resale Amendment
☐ Electric/Water/Sewer	☐ Brief	☐ Petition for Reconsideration	☐ Reservation Letter
☐ Gas	☐ Certificate	☐ Petition for Rulemaking	☐ Response
☐ Railroad	☐ Comments	☐ Petition for Rule to Show Cause	☐ Response to Discovery
☐ Sewer	☐ Complaint	☐ Petition to Intervene	☐ Return to Petition
☐ Telecommunications	☐ Consent Order	☐ Petition to Intervene Out of Time	☐ Stipulation
☐ Transportation	☐ Discovery	☐ Prefiled Testimony	☐ Subpoena
☐ Water	☐ Exhibit	☐ Promotion	☐ Tariff
☐ Water/Sewer	☐ Expedited Consideration	☐ Proposed Order	☐ Other:
☐ Administrative Matter	☐ Interconnection Agreement	☐ Protest	
☐ Other:	☐ Interconnection Amendment	☐ Publisher's Affidavit	
	☐ Late-Filed Exhibit	☐ Report	

Print Form Reset Form

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BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-226-E

In re:	
South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated	**MOTION FOR ADMISSION** ***PRO HAC VICE***

Pursuant to Rule 404, SCACR, Sierra Club hereby moves for the admission pro hac vice of Dorothy E. Jaffe to practice before this Commission as counsel of record on behalf of Sierra Club in the above-captioned proceeding. Pursuant to Rule 404, SCACR, Ms. Jaffe and counsel of record, Robert Guild, have filed a copy of the Verified Application for Admission Pro Hac Vice with the South Carolina Supreme Court, together with the requisite fee. The original of that Verified Application is attached hereto.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, Sierra Club requests this motion be granted.

Dated: April 8, 2020.

Robert Guild
S.C. Bar No. 2358
314 Pall Mall Street
Columbia, SC 29201
(803) 917-5738
bguild@mindspring.com

Attorney for Sierra Club

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VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA

IN RE:

Docket No. 2020-226-E

South Carolina Energy Freedom Act (House Bill 3659)
Proceeding Related to S.C. Ann. Section 58-37-40 and
Integrated Resource Plans for Dominion Energy
South Carolina, Incorporated

Public Service Commission of
South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Comes now Dorothy E. Jaffe, applicant herein, and respectfully represents the following:

1. Applicant resides at:

7796 Kawshek Path
Street Address

Hanover	Anne Arundel	MD	21076
City	County	State	Zip Code

802-236-0368
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Sierra Club, with offices at

50 F Street NW, Floor 8
Street Address

Washington	Washington	DC	20001
City	County	State	Zip Code
202-675-6275	802-236-0368	202-547-6009	dori.jaffe@sierraclub.org
Primary Telephone	Cell Phone	Fax Number	Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by Sierra Club to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since December of 2015, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of Maryland where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
State of Arizona	November 1, 2002
State of Washington	November 13, 2003
U.S. Court of Appeals, Ninth Circuit	January 5, 2015

Court:	Date Admitted:
U.S. District Court of Washington, Eastern District	December 9, 2008
U.S. District Court of Washington, Western District	September 16, 2008

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

State of Arizona (voluntarily resigned)
State of Washington (inactive)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Robert Guild of the _____ law firm, which has offices at:

314 Pall Mall Street
Street Address

Columbia	Richland	SC	29201
City	County	State	Zip Code
803-252-1419	803-917-5738		bguild@mindspring.com
Primary Telephone	Cell Phone	Fax Number	Email Address

803-917-5738
South Carolina Bar Number

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

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12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 3rd day of April, 2020

DOROTHY E. JAFFE, APPLICANT

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VERIFICATION

STATE OF _____)

COUNTY OF _____)

I, Dorothy E. Jaffe, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

DOROTHY E. JAFFE, APPLICANT/AFFIANT

Subscribed and sworn to before me this 3rd day of April, 2020

Notary Public for the State of District of Columbia

My Commission Expires: 08/14/2024

FRANCESCA DI JULIO NOTARY PUBLIC My Comm. Exp. Aug 14, 2024 DISTRICT OF COLUMBIA

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 8th day of April, 2020

ROBERT GUILD, LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the $250 filing fee payable to the South Carolina Supreme Court on this 8th day of April, 2020

ROBERT GUILD

Court of Appeals of Maryland

Annapolis, MD

CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

I, Suzanne Johnson, Clerk of the Court of Appeals of Maryland, do hereby certify that on the fourteenth day of December, 2015,

Dorothy Elizabeth Jaffe

having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court.

In Testimony Whereof, *I have hereunto set my hand as Clerk, and affixed the Seal of the Court of Appeals of Maryland, this twenty-fourth day of March, 2020.*

Clerk of the Court of Appeals of Maryland

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BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-226-E

In re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated	**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2018-318-E, listed below, a copy of the Motion for Admission Pro Hac Vice via electronic mail on this day 8 April 2020.

Jeffrey M. Nelson,
jnelson@ors.sc.gov

Andrew M. Bateman, abateman@ors.sc.gov

Becky Dover, bdover@scconsumer.gov

Carri Grube-Lybarker,
clybarker@scconsumer.gov

Nanette S. Edwards,
nedwards@ors.sc.gov

J. Blanding Holman, IV,
bholman@selcsc.org

Richard L. Whitt,
Richard@rlwhitt.law

Weston Adams III,
Weston.adams@nelsonmullins.com

Jeremy C. Hodges,
Jeremy.hodges@nelsonmullins.com

James Goldin,
Jamey.goldin@nelsonmullins.com

Belton T. Zeigler

K. Chard Burgess,
Kenneth.burgess@dominionenergy.com

Matthew W. Gissendanner,
matthew.gissendanner@dominionenergy.com

Robert Guild