SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270 | 463 KING STREET, SUITE B CHARLESTON, SC 29403-7204 | Facsimile 843-414-7039

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 1 of 11

August 28, 2019

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: In re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)
Docket Number 2019-185-E

Dear Ms. Boyd:

Please find attached for electronic filing the *Motion for Admission Pro Hac Vice* and *Verified Application of Maia Danaid Hutt* on behalf of the South Carolina Coastal Conservation League (CCL) and Southern Alliance for Clean Energy (SACE) in the above-referenced matter.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stinson W. Ferguson
Stinson W. Ferguson
Southern Environmental Law Center
463 King St., Suite B
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

Attorney for South Carolina Coastal Conservation League and Southern Alliance for Clean Energy

Enclosures
CC (w/encl.): Parties of Record

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 2 of 11

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-185-E

In re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)	)	MOTION FOR ADMISSION *PRO HAC VICE*

Intervenors South Carolina Coastal Conservation League ("CCL"), and Southern Alliance for Clean Energy ("SACE") hereby move the Public Service Commission of South Carolina ("Commission") to permit Maia Danaid Hutt to practice *pro hac vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Hutt, with the consent of counsel of record, has submitted to the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, CCL and SACE respectfully request that this motion be granted.

This 28 day of August, 2019.

/s/ Stinson W. Ferguson
Stinson W. Ferguson
SC Bar No. 79871
Southern Environmental Law Center
463 King St., Suite B
Charleston, SC 29403

Telephone: (843) 720-5270
Fax: (843) 414-7039
sferguson@selcsc.org

Attorney for South Carolina Coastal Conservation League and Southern Alliance for Clean Energy

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 3 of 11

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 4 of 11

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-185-E

In re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)	)	CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified Application by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

Alexander W. Knowles, Counsel
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1401 Main Street, Suite 900
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Weston Adams III, Counsel
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 11070
Columbia, SC 29211
weston.adams@nelsonmullins.com

This the 28 day of August, 2019.

s/ Stinson W. Ferguson
Stinson W. Ferguson
Southern Environmental Law Center

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 5 of 11

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 6 of 11

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

In the Matter of: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)	Docket No. 2019-185-E	Public Service Commission of South Carolina
Plaintiff	Case No.	Tribunal
vs.	Mailing Address of Tribunal:	101 Executive Center Drive, Suite 100 Columbia, SC 29210
Defendant		

Comes now Maia Danaid Hutt, applicant herein, and respectfully represents the following:

1. Applicant resides at:

[redacted]
Street Address

[redacted] City | [redacted] County | [redacted] State | [redacted] Zip Code

[redacted]
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern Environmental Law Center, with offices at

601 W. Rosemary Street, Suite 220
Street Address

Chapel Hill	Orange	NC	27516
City	County	State	Zip Code
919-967-1450	[redacted]	919-929-4921	mhutt@selcnc.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 South Carolina Coastal Conservation League and Southern Alliance for Clean Energy 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 October of 2018, 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 North Carolina 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:
North Carolina State Courts	October 12, 2018
U.S. District Court for the Eastern District of North Carolina	May 9, 2019

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.)

N/A

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 Stinson W. Ferguson of the Southern Environmental Law Center law firm, which has offices at:

463 King Street, Suite B
Street Address

Charleston	Charleston	South Carolina	29403
City	County	State	Zip Code
843-720-5270		843-414-7039	sferguson@selcsc.org
Primary Telephone	Cell Phone	Fax Number	Email Address

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 7 of 11

79871
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).

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.

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 8 of 11

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

DATED this 28 day of August, 20 19

APPLICANT

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 9 of 11

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 10 of 11

VERIFICATION

STATE OF North Carolina)

COUNTY OF Orange)

I, Maia Danaid Hutt, 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.

APPLICANT/AFFIANT

Subscribed and sworn to before me this 28 day of August, 20 19

Notary Public for the State of North Carolina

My Commission Expires: 03/25/2023

LAUREN G FRY
NOTARY PUBLIC
ORANGE COUNTY
STATE OF NORTH CAROLINA
MY COMMISSION EXPIRES 03-25-2023

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 28 day of August, 20 19

Stinson W Ferguson with express permission by Lauren Fry

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 28 day of August, 20 19

APPLICANT/AFFIANT

Supreme Court
OF THE STATE OF NORTH CAROLINA

I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on October 12, 2018, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

MAIA DANAID HUTT

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this August 7, 2019.

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina

ELECTRONICALLY FILED - 2019 August 28 4:43 PM - SCPSC - Docket # 2019-185-E - Page 11 of 11