

# SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 919-967-1450

601 WEST ROSEMARY STREET, SUITE 220  
CHAPEL HILL, NC 27516-2356

Facsimile 919-929-9421

October 18, 2013

**FILED**  
**OCT 18 2013**  
Clerk's Office  
N.C. Utilities Commission

Via Hand Delivery

Ms. Gail Mount  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street  
Fifth Floor  
Raleigh, North Carolina 27603

Re: Docket No. E-100, SUB 136

Dear Ms. Mount:

Please find enclosed the original and 30 copies of the Motion for Limited Practice for filing in the above – referenced case. Please contact me if you have any questions regarding this filing. By copy of this letter, I am serving all parties of record on the service list.

Sincerely yours,

*Robin G. Dunn*

Robin G. Dunn

RGD

Enclosures

Cc: All counsel of record (via electronic delivery or U.S. mail)

*Clerk's*  
*AL*  
*7Comm*  
*Watson*  
*Green*  
*Duttley*  
*Conrad*  
*Hoover*  
*Kite*  
*Hilburn*  
*Sessions*  
*Ericson*  
*Jones*  
*ExDir*  
*3/13 Legal*  
*3/13 Acctg*  
*2/13 Econ*  
*3/13 Elec*

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 136

**FILED**

**OCT 18 2013**

Clerk's Office  
N.C. Utilities Commission

In the Matter of: )

Biennial Determination of Avoided Cost )  
Rates for Electric Utility Purchases from )  
Qualifying Facilities – 2012 )

**MOTION FOR LIMITED PRACTICE**

Pursuant to North Carolina General Statutes ("N.C.G.S.") §§ 62-60 and 84-4.1 and Rule R1-22 of the North Carolina Utilities Commission's ("Commission") Rules of Practice and Procedure, Katie Ottenweller of the Southern Environmental Law Center respectfully requests the Commission to enter an order admitting her to practice before the Commission for the purpose of appearing on behalf of Southern Alliance for Clean Energy ("SACE") in the above - captioned proceeding. In support of this Motion, Ms. Ottenweller alleges and shows the Commission that:

1. Ms. Ottenweller is an attorney in good standing and licensed to practice in Georgia and Pennsylvania and she will appear on behalf of SACE in the above - captioned proceeding.
2. Ms. Ottenweller' full name, address, and bar membership numbers are:

Katie Ottenweller, Esq. (GA #918668 active status, PA #307723 inactive status)  
Southern Environmental Law Center  
127 Peachtree Street, Suite 605  
Atlanta, Georgia 30303  
Telephone: 404-521-9900 Facsimile: 404-521-9909  
E-mail: [kottenweller@selcga.org](mailto:kottenweller@selcga.org)

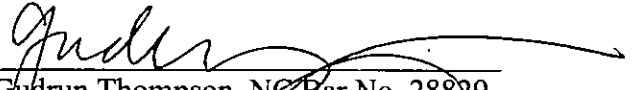
3. Ms. Ottenweller will continue to represent SACE in the above – captioned proceeding until the final determination thereof, unless permitted to withdraw sooner by order of the Commission.
4. Ms. Ottenweller has agreed to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if she were a regularly admitted and licensed member of the Bar of North Carolina in good standing.
5. The State of Georgia, in which Ms. Ottenweller is regularly admitted to practice, grants permission to members in good standing of the North Carolina State Bar to appear before courts and regulatory commissions under circumstances similar to those authorized by N.C.G.S. § 84-4.1.
6. Ms. Ottenweller is associated for purposes of appearing before the Commission with Gudrun Thompson, of the Southern Environmental Law Center, a resident of this State who is duly and legally permitted to practice in the General Court of Justice of North Carolina, upon whom service may be had in all matters connected with the legal proceedings, or any disciplinary matter with the same effect as if personally made on Ms. Ottenweller.
7. Ms. Ottenweller has not been disciplined by any court or lawyer regulatory organization nor has she had any *pro hac vice* revoked. The statements required by N.C.G.S. § 84-4.1 are attached to this motion. Upon the Commission's issuance of an order granting this motion, the appropriate filings and fees will be made to the State Treasurer for support of the General Court of Justice and to the North Carolina State Bar as required by N.C.G.S. § 84-4.1.

WHEREFORE, Ms. Ottenweller respectfully requests the Commission to enter an order admitting her to practice before the Commission for the purpose of appearing on behalf of SACE in the above-captioned proceedings.

Respectfully submitted this 16 day of October, 2013.



Katie Ottenweller  
Southern Environmental Law Center  
The Candler Building  
127 Peachtree St. Suite 605  
Atlanta, GA 30303-1840  
P: (404) 521-9900  
F: (404) 521-9909  
[kottenweller@selcga.org](mailto:kottenweller@selcga.org)



Gudrun Thompson, NC Bar No. 28829  
Southern Environmental Law Center  
601 West Rosemary Street, Suite 220  
Chapel Hill, NC 27516  
P: (919) 967-1450  
F: (919) 929-9421  
[gthompson@selcnc.org](mailto:gthompson@selcnc.org)

*Counsel for Southern Alliance for Clean  
Energy*

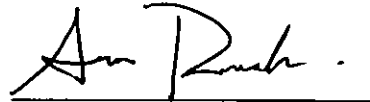
**VERIFICATION**

Katie Ottenweller, first being duly sworn, deposes and says that she is an attorney for Southern Alliance for Clean Energy ("SACE"); that she has read the foregoing Motion for Limited Admission To Practice and the same is true of her personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, she believes them to be true; and that she is authorized to sign the verification on behalf of SACE.

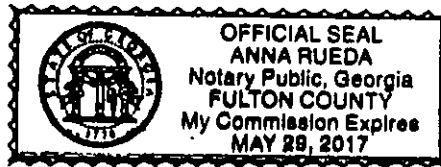


Katie Ottenweller, Esq.

Subscribed and sworn to 16 day of October, 2013 by Katie Ottenweller, Esq.



Notary Public



CLIENT STATEMENT (G.S. 84-4.1(2))

I, Charlie Coggeshall, hereby certify that I am a Renewable Energy Manager for the Southern Alliance for Clean Energy, whose principal address is Post Office Box 1842 Knoxville, TN 37901, and that Southern Alliance for Clean Energy has retained Katie Ottenweller of the Southern Environmental Law Center to represent it before the North Carolina Utilities Commission in Docket No. E-100, Sub 136.

This the 17 day of October, 2013.

SOUTHERN ALLIANCE FOR CLEAN ENERGY

By: 

[Client's signature]

Charlie Coggeshall  
Renewable Energy Manager

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 136**

**In the Matter of:**

**Biennial Determination of Avoided  
Cost Rates for Electric Utility  
Purchases from Qualifying Facilities –  
2012**

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**STATEMENT REQUIRED BY  
N.C.G.S. § 84-4.1(2)**

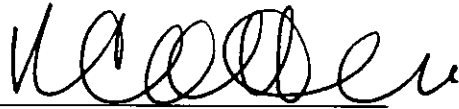
I, Katie Ottenweller, hereby state that:

1. I am an attorney at law regularly admitted to practice and in good standing in Georgia and Pennsylvania.
2. I am Counsel for the Southern Alliance for Clean Energy ("SACE") and desire to represent SACE in the above-captioned proceeding, which is currently pending before the North Carolina Utilities Commission ("Commission").
3. My full name, address, and bar identification numbers are: Katie Ottenweller, Georgia Bar #918668 and Pennsylvania Bar #307723, Southern Environmental Law Center, 127 Peachtree Street, Suite 605, Atlanta, Georgia 30303 (ph): (404) 521-9900 (fax): (404) 521-9909, email: [kottenweller@selcga.org](mailto:kottenweller@selcga.org).
4. I will, unless permitted to withdraw sooner by order of the Commission, continue to represent SACE in the above-captioned proceeding until the final determination thereof.
5. I agree, with reference to all matters incident to Commission proceedings, to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the Commission, the General Court of Justice, and the North

Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

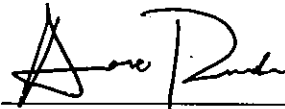
6. Georgia, in which I am regularly admitted to practice, grants similar privileges to appear on a limited basis in judicial and regulatory proceedings being conducted in that jurisdiction to members of the Bar of North Carolina.
7. I have associated, for purposes of appearing and participating in Commission proceedings, with Gudrun Thompson, Southern Environmental Law Center, 601 West Rosemary Street, Suite 220, Chapel Hill, North Carolina 27516 (ph): (919) 967-1450, an attorney who is a resident of North Carolina and is duly and legally admitted to practice in the General Court of Justice of North Carolina, upon whom service may be had in all matters connected with the above-captioned proceeding, or any disciplinary matter, with the same effect as if personally made on me within this State.
8. I have not been disciplined by any court or lawyer regulatory organization and have not had a revocation of any *pro hac vice* admission.
9. I will submit a check for \$25.00 to the North Carolina State Bar and a check for \$200.00 to the State Treasurer when the Motion is granted.



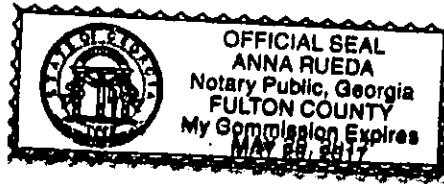


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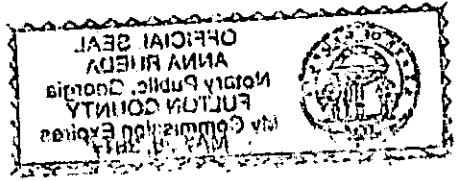
The foregoing instrument was acknowledged before me on this 16 day of October, 2013 by Katie Ottenweller.



Notary Public



1999



SOUTHERN ENVIRONMENTAL LAW CTR  
CHAPEL HILL CHECKING  
601 WEST ROSEMARY STREET SUITE 220  
CHAPEL HILL, NC 27516-2356

1974

October 18, 2013  
Date

Pay to the Order of Administrative Office of the Courts \$ 200.00  
Two Hundred and 00/100 Dollars



Wells Fargo Bank, N.A.  
Virginia  
wellsfargo.com

PHU application for Katie Offenweller  
For Docket E-100, Sub 136 NCUC

Jan Oliver MP

SOUTHERN ENVIRONMENTAL LAW CTR  
CHAPEL HILL CHECKING  
601 WEST ROSEMARY STREET SUITE 220  
CHAPEL HILL, NC 27516-2356

1975

October 18 2013  
Date

Pay to the Order of North Carolina State Bar \$ 25.00  
Twenty-five and 00/100 Dollars



Wells Fargo Bank, N.A.  
Virginia  
wellsfargo.com

PHU Admission fee: Katie Offenweller  
For NCUC-Docket # E-100, Sub 136

Jan Oliver MP

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Motion for Limited Practice in Docket No. E-100, SUB 136 has been served by electronic mail or by depositing a copy in the United States mail, postage prepaid, addressed to the parties of record, or their counsel.

This 18<sup>th</sup> day of October, 2013.

Robin G. Dunn  
Robin G. Dunn