

STATE OF INDIANA  
INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC )  
SERVICE COMPANY FOR AUTHORITY TO )  
MODIFY ITS RATES AND CHARGES FOR )  
ELECTRIC UTILITY SERVICE AND FOR )  
APPROVAL OF: (1) CHANGES TO ITS )  
ELECTRIC SERVICE TARIFF INCLUDING A )  
NEW SCHEDULE OF RATES AND CHARGES )  
AND CHANGES TO THE GENERAL RULES )  
AND REGULATIONS AND CERTAIN RIDERS; )  
(2) REVISED DEPRECIATION ACCRUAL )  
RATES; (3) INCLUSION IN ITS BASIC RATES )  
AND CHARGES OF THE COSTS )  
ASSOCIATED WITH CERTAIN PREVIOUSLY )  
APPROVED QUALIFIED POLLUTION )  
CONTROL PROPERTY, CLEAN COAL )  
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AND FEDERALLY MANDATED COMPLIANCE )  
PROJECTS; AND (4) ACCOUNTING RELIEF )  
TO ALLOW NIPSCO TO DEFER, AS A )  
REGULATORY ASSET OR LIABILITY, )  
CERTAIN COSTS FOR RECOVERY IN A )  
FUTURE PROCEEDING. )

CAUSE NO. 45159

**VERIFIED MOTION FOR TEMPORARY ADMISSION OF CASEY ROBERTS**

Pursuant to Indiana Rules of Court, Rules for Admission to the Bar and the Discipline of Attorneys Rule 3, Sierra Club respectfully petitions this Court for temporary admission of Casey A. Roberts to appear before the Indiana Utility Regulatory Commission and participate as an attorney of law in the above-captioned docket on behalf of Intervenor Sierra Club. In support of this petition, I, Casey Roberts, being first duly sworn on oath, state as follows:

POSTMARKED ON:

JAN 29 2019

GREGORY R. PACHMAYR  
CLERK OF COURTS - STATE OF INDIANA

1. My residential address is 281 S. Grant St., Denver, CO 80209. My office address is Sierra Club, 1536 Wynkoop Street, Suite 312, Denver CO, 80202. My office phone number is (303) 454-3355 and my email address is [casey.roberts@sierraclub.org](mailto:casey.roberts@sierraclub.org).

2. I am a licensed attorney in the following states:

- State of California, Bar # 253474, Date of Admission: 12/07/2007
- State of Texas, Bar # 24062967, Date of Admission: 05/02/2008
- State of Colorado, Bar # 51801, Date of Admission: 02/02/2018

3. I am also admitted to the following federal courts:

- U.S. District Court, Northern District of California, Date of Admission:  
10/13/2009
- U.S. District Court, Eastern District of California, Date of Admission:  
10/13/2009
- U.S. District Court, Central District of California, Date of Admission:  
08/06/2010
- U.S. District Court, Western District of Texas, Date of Admission:  
01/27/2014
- 9th Circuit, U.S. Court of Appeals, Date of Admission: 11/27/2009
- 8th Circuit, U.S. Court of Appeals, Date of Admission: 04/08/2009
- 5th Circuit, U.S. Court of Appeals, Date of Admission: 01/19/2016
- 2nd Circuit, U.S. Court of Appeals, Date of Admission: 11/23/2016
- D.C. Circuit, U.S. Court of Appeals, Date of Admission: 08/15/2016

4. I am currently a member of good standing in all of the jurisdictions in which I am licensed to practice.

5. I have never been suspended, disbarred, or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction.

6. No disciplinary proceeding is pending against me in any jurisdiction.

7. The following is a list of proceedings/cases in which I and/or members of my firm have appeared by temporary admission in the last five years:

I appeared by temporary admission in the following matter before the Indiana Utility Regulatory Commission:

- *In re: Indiana Michigan Power Company*, Cause No. 44967 (IURC);

Tony Mendoza, a member of my firm (Sierra Club), appeared by temporary admission in the following matter before the Indiana Utility Regulatory Commission:

- *In re: Northern Indiana Public Service Company*, Cause No. 44872 (IURC);

Kristin Henry, a member of my firm (Sierra Club), appeared by temporary admission in the following matters before the Indiana Utility Regulatory Commission:

- *In re: Indianapolis Power & Light Company*, Cause No. 44242 (IURC);
- *In re: Duke Energy Indiana, Inc.*, Cause No. 44217 (IURC);

Nathaniel Shoaff, a member of my firm (Sierra Club), appeared by temporary admission in the following matters before the Indiana Office of Environmental Adjudication:

- *Sierra Club and Hoosier Environmental Council v. Indiana Department of Environmental Management and Liberty Mine, LLC*, Office of Environmental Adjudication, Cause No. 15-W- J-4850 (2016).

To the best of my knowledge, and after thorough review, no other member of Sierra Club has appeared by temporary admission in any court or administrative agency in Indiana during the last five (5) years.

8. Good cause exists for my temporary admission because, as a rate design and coal oversight program attorney for Sierra Club, I have extensive experience in the complex field of law relating to this case.

9. I have read and agree to be bound by the Rules of Professional Conduct adopted by the Indiana Supreme Court, and I consent to the jurisdiction of the state of Indiana, the Indiana Supreme Court, and the Indiana Court of Disciplinary Commission to resolve any disciplinary matter that might arise as a result of the representation.

10. I have paid the annual registration fee set forth in Admission and Discipline Rule 2(b) in the amount of \$180.00 to the Clerk of the Supreme Court in accordance with Admission and Discipline Rule 3.

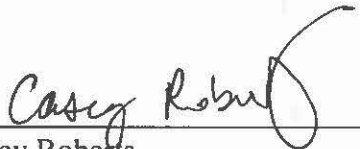
11. In accordance with Admission and Discipline Rule 3, Section 2(a)(4), I will file a copy of the payment receipt and temporary admission number issued by the Clerk of the Supreme Court once it is received.

12. I have obtained local counsel, co-signed below, to assist in this case before the Indiana Utility Regulatory Commission.

13. I am not a resident of the State of Indiana, am not regularly employed in the State of Indiana, and do not regularly engage in business or professional activities in the State of Indiana.


WHEREFORE, Petitioner, by counsel, respectfully requests that the Indiana Court of Appeals admit Casey Roberts to appear *pro hac vice* in order to represent Petitioner in the above-captioned case.

Dated: January 29, 2019.

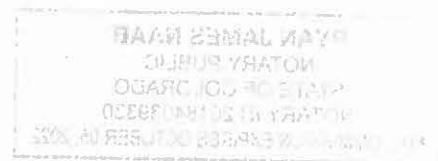
  
\_\_\_\_\_  
Casey Roberts  
Senior Attorney  
Sierra Club  
1536 Wynkoop St., Suite 312  
Denver, Colorado, 80202  
[casey.roberts@sierraclub.org](mailto:casey.roberts@sierraclub.org)  
(303) 454-3355

As co-counsel for Petitioner in the above matter, I have read and reviewed the above petition for temporary admission by counsel Casey Roberts. I affirm, under the penalties for perjury, that the foregoing representations are true.

Respectfully submitted,

  
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Kathryn A. Watson (#1939-49)  
Cantrell Strenski & Mehringer, LLP  
150 West Market Street, Suite 800  
Indianapolis, IN 46204  
Telephone: 317.352.3510  
Fax: 317.352.3501  
[kwatson@csmlawfirm.com](mailto:kwatson@csmlawfirm.com)

*Counsel for Petitioner*



# Temporary Admission Receipt

**Casey A. Roberts (6260-95-TA)**

**Firm:** Sierra Club

**Phone:** (303) 454-3355

**Status Date:** 03/21/2018

**Business Address:**

**Mobile:**

1536 Wynkoop St.  
Suite 312  
Denver, Colorado 80202

**Fax:**

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**Amount Paid:** \$180.00

**Date Paid:** 01/01/2019

**For Year:** 2019

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Case Number	Start Date	Notice Return Date	End Date
44967	12/08/2017	03/21/2018	
45159	01/29/2019		

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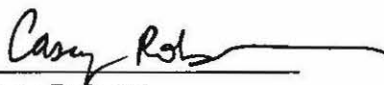
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**AFFIDAVIT OF CASEY ROBERTS**

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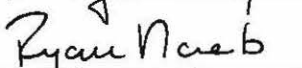
State of )  
Colorado )

Casey Roberts, being first duly sworn, states that, to the best of her knowledge, the statements made in the Verified Motion for Temporary Admission of Casey Roberts are true and correct.

  
Casey Roberts

SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of January 2019.

My Commission Expires: 10/05/2022

  
Notary Public

