

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 ) CAUSE NO. 45159  
RATES; (3) INCLUSION IN ITS BASIC RATES )  
AND CHARGES OF THE COSTS )  
ASSOCIATED WITH CERTAIN PREVIOUSLY )  
APPROVED QUALIFIED POLLUTION )  
CONTROL PROPERTY, CLEAN COAL )  
TECHNOLOGY, CLEAN ENERGY PROJECTS )  
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.

**VERIFIED MOTION FOR TEMPORARY ADMISSION OF TONY MENDOZA**

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 Tony Mendoza 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, Tony Mendoza, 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 1359 Hayes Street, San Francisco, CA 94117. My office address is Sierra Club, 2101 Webster Street, Suite 1300, Oakland CA, 94612. My office phone number is (415) 977-5589 and my email address is [tony.mendoza@sierraclub.org](mailto:tony.mendoza@sierraclub.org).

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

- District of Columbia, Bar # 996012, Date of Admission 8/9/2010
- New York, Bar # 4751046, Date of Admission 9/30/2009.

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

4. 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.

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

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

- *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);

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

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

7. Good cause exists for my temporary admission because, as a Sierra Club Staff Attorney, I have experience in the field of law relating to this case, as well as familiarity with NIPSCO's resource planning.

8. 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.

9. 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.

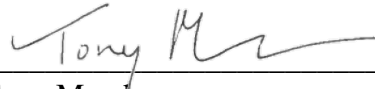
10. In accordance with Admission and Discipline Rule 3, Section 2(a)(4), I will file a copy of the payment receipt and temporary admission number issued by the Clerk of the Supreme Court once it is received.

11. I have obtained local counsel, co-signed below, to assist in this case before the Office of Environmental Adjudication.

12. 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 Tony Mendoza to appear *pro hac vice* in order to represent Petitioner in the above-captioned case.

Dated: January 29th, 2019.

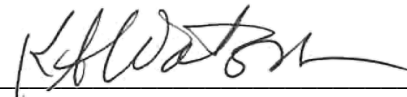


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Tony Mendoza  
Staff Attorney, Sierra Club  
2101 Webster St., 13th Floor  
Oakland, CA 94612  
tony.mendoza@sierraclub.org  
(415) 977-5589

As co-counsel for Petitioners in the above matter, I have read and reviewed the above petition for temporary admission by counsel Tony Mendoza. 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@csmllawfirm.com](mailto:kwatson@csmllawfirm.com)

*Counsel for Petitioners*

## Temporary Admission Receipt

**Tony G. Mendoza (5905-95-TA)**

**Firm:** Sierra Club

**Phone:** (415) 977-5589

**Status Date:** 01/29/2019

**Business Address:**

**Mobile:**

2101 Webster Street  
Suite 1300  
Oakland, California 94612

**Fax:**

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**Amount Paid:** \$180.00

**Date Paid:** 01/29/2019

**For Year:** 2019

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Case Number	Start Date	Notice Return Date	End Date
44872	03/01/2017	04/21/2017	01/07/2019
45159	01/29/2019		

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CAUSE NO. 45159

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AFFIDAVIT OF TONY MENDOZA

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State of )  
California )

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

\_\_\_\_\_  
Tony Mendoza

SUBSCRIBED AND SWORN to before me this \_\_\_\_ day of \_\_\_\_\_ 2019.

My Commission Expires:

\_\_\_\_\_  
Notary Public

*See attached CA Jurat Certificate*

*-SB*



**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

- ☒ See Attached Document (Notary to cross out lines 1-6 below)  
☐ See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

*(Handwritten signature line)*

Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

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.

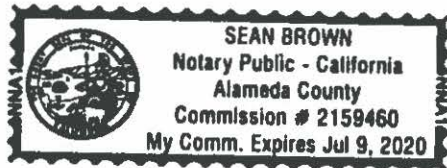
State of California  
 County of Alameda

Subscribed and sworn to (or affirmed) before me  
 on this 28 day of January, 2019  
 by Date Month Year

(1) Tony Mendoza

(and (2) \_\_\_\_\_),  
 Name(s) of Signer(s)

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



Place Notary Seal Above

Signature Sean Brown  
 Signature of Notary Public

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: IN Affidavit Document Date: 1/28/19

Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_