

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

**Public Service Commission
Practice and Procedure
Rulemaking**

Case No. AD-10-167

PUBLIC SERVICE COMMISSION STAFF TESTIMONY

July 1, 2010

I am Illona A. Jeffcoat-Sacco, General Counsel with the Public Service Commission.

The proposed amendment repeals language regarding practice before the Commission that is inconsistent with the North Dakota Admission to Practice Rules.

I will not be available to attend the hearing on the proposed change. Please accept this written testimony as staff testimony on this rule.

The area of attorney practice outside one's home jurisdiction is, in today's global environment, an area of complexity and change. The North Dakota Admission to Practice Rules govern the practice of law in North Dakota, and the Commission's procedural rules should not include any language that might conflict with those Admission to Practice rules or confuse persons who are investigating how to legally practice in North Dakota. For this reason, staff recommends the conflicting language be deleted from the Commission procedural rules.

A Statement on Regulatory Analysis, Takings Assessment, and Small Entity Regulatory Analysis was prepared and filed on June 2, 2010, for this Practice and Procedure rulemaking proceeding.

As of the date of filing this testimony, the Commission has not received any written comments concerning this proceeding.

This concludes my testimony. Thank you.