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To: [PUC - Clerk](#); [Anderson, Holly](#)
Subject: Comment on PUC Rule 2
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Dear Public Utility Commission Members:

Thank you for the opportunity to Comment on Rule 2. I write to bring the Commission's attention to the fact that Rule 2.201(B) appears to presume that the PUC can authorize "nonresident attorneys" to practice law in Vermont without a license. I do not believe the PUC has the authority or jurisdiction to abrogate Administrative Order 41, which was promulgated by the Vermont Supreme Court pursuant to the Vermont Constitution.

I urge the PUC to eliminate Rule 2.201(B) because I believe this Rule attempts to impermissibly abrogate Administrative Order 41, Section 1 which governs the unauthorized practice of law in the State of Vermont. Moreover, A.O. 41, Section 16 regarding Admission Pro Hac Vice which governs the admission of "nonresident attorneys," incorporates important safeguards which should never be dispensed with by any individual tribunal in this state.

I am hopeful that you take the time to review this important issue and Administrative Order 41, and perhaps obtain a legal opinion from the Attorney General's office as to whether the PUC is authorized to alter the law regarding the Licensing of Attorneys within the State of Vermont and the unauthorized practice of law.

Thank you for the opportunity to comment.

Best regards,

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