**BEFORE THE**

**PUBLIC UTILITIES COMMISSION OF OHIO**

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| **In the Matter of the Application of the Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the form of an Electric Security Plan** | **)**  **)**  **)**  **)**  **)**  **)**  **)** | **Case No. 14-1297-EL-SSO** |

**MOTION TO APPEAR *PRO HAC VICE***

**OF RICHARD LEHFELDT**

Pursuant to Rule 4901-1-08(B) of the Ohio Administrative Code and Gov. Bar. R. XII(2), Daniel W. Wolff, an attorney licensed to practice in the State of Ohio, respectfully moves that Richard Lehfeldt be admitted *pro hac vice* to practice before the Public Utilities Commission of Ohio (the “Commission”) for the purposes of representing CPV Shore, LLC (“CPV Shore”) in the above-captioned proceeding. In support thereof, Mr. Wolff states as follows:

* Pursuant to Gov. Bar R. XII(2)(A)(1), Mr. Lehfeldt neither resides in nor is regularly employed at an office in Ohio.
* Pursuant to Gov. Bar R. XII(2)(A)(2), Mr. Lehfeldt has neither taken and failed the Ohio bar examination, nor been denied admission without examination, nor had an application for admission in Ohio denied on character and fitness ground pursuant to Gov. Bar R. I within the last five years.
* Pursuant to Gov. Bar R. XII(2)(A)(3), Mr. Lehfeldt has applied for registration with the Supreme Court Office of Attorney Services, paid an annual registration fee of $150, and been issued a Certificate of *Pro Hac Vice* Registration, attached hereto, by the Supreme Court of Ohio Office of Attorney Services.
* Pursuant to Gov. Bar R. XII(2)(A)(5) and XII(2)(A)(6)(d), Mr. Lehfeldt has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year.
* Pursuant to Gov. Bar R. XII(2)(A)(6)(a), Mr. Lehfeldt’s residential address is 8609 Burdette Road, Bethesda, MD 20817. Mr. Lehfeldt is employed by the law firm of Crowell & Moring LLP, located at 1001 Pennsylvania Ave., N.W., Washington, DC 20004.
* Pursuant to Gov. Bar R. XII(2)(A)(6)(b), Mr. Lehfeldt was admitted to practice law in the District of Columbia on December 13, 1982 (#367021).
* Pursuant to Gov. Bar R. XII(2)(A)(6)(c), and as he attests in the Affidavit of Out-of-State Attorney, attached hereto, Mr. Lehfeldt has not been disbarred, is not currently under suspension, and has not resigned with discipline pending in any jurisdiction in which he has ever been admitted.
* Pursuant to Gov. Bar R. XII(2)(A)(6)(e), I, Daniel W. Wolff (#0074168), an active Ohio attorney in good standing, hereby agree to associate with Richard Lehfeldt in this proceeding.

Also attached is a Certificate of Service containing all known parties and attorneys of record in this proceeding. Furthermore, Mr. Lehfeldt understands that, if this Motion is granted, he must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Office of Attorney Services within thirty days of the Order.

WHEREFORE, Daniel W. Wolff respectfully requests that Richard Lehfeldt be permitted to practice before the Commission in the above-captioned proceeding.

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| January 23, 2015 | Respectfully submitted,  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Daniel W. Wolff (#0074168)  Crowell & Moring LLP  1001 Pennsylvania Ave., N.W.  Washington, DC 20004  Tel: (202) 624-2621  Fax: (202) 624-5116  dwolff@crowell.com  *Counsel for CPV Shore, LLC* |