

BEFORE

THE PUBLIC UTILITIES COMMISSION OF ONIO

In the Matter of the Application of the Columbus Southern Power Company for Approval of its Electric Security Plan; an) } }	Case No. 08-917-EL-SSO
Amendment to its Corporate Separation Plan; And the Sale or Transfer of Certain Generating Assets)	,
In the Matter of the Application of Ohio Power Company for Approval of its Electric Security Plan; and an Amendment to its Corporate Separation Plan)))	Case No. 08-918-EL-SSO

MOTION FOR ADMISSION PRO HAC VICE OF GRACE WUNG

I. MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Ohio Administrative Code ("OAC") 4901-01-08(B) Douglas M. Mancino, an attorney licensed to practice law in the State of Ohio hereby moves the Commission to permit Grace C. Wung to appear and participate as counsel for Wal-Mart Stores East, LP ("Wal-Mart East"), Sam's East, Inc. ("Sam's East"), and Macy's Inc. ("Macy's"), (collectively, the "Commercial Group")1 in the above-captioned cases. The basis for this motion is more fully set forth in the below Memorandum in Support.

IJ. MEMORANDUM IN SUPPORT

Ms. Wung is an attorney, in good standing, with the law firm of McDermott Will & Emery, LLP, located in Washington, D.C.², which represents the Commercial Group. Ms. Wung is an active member of and is licensed in the District of Columbia (Bar No. 498649), Maryland

At this time the Commercial Group includes Wal-Mert East, Sam's East, and Macy's, but it anticipates that additional commercial customers will join the group. The Commercial Group will make the appropriate filings at the time additional commercial customers are added to the Commercial Group.

² As of September 1, 2008, Ms. Wung transferred from the Boston, Massachusetts office of McDermott Will & Emery, LLP and is currently in the process of updating each of the jurisdictions in which she is licensed of her new address and contact information.

(Attorney No. 0312170387), and the Commonwealth of Massachusetts (Bar No. 664565). Ms.

Wung has participated in proceedings addressing energy and utilities in various states. Ms.

Wung's contact information is:

Grace C. Wung McDermott Will & Emery LLP 600 Thirteenth Street, N.W. Washington, DC 20005 Tel: (202) 756-8160 Fax: (202) 756-8087

III. <u>CONCLUSION</u>

gwung@mwe.com

For the reasons set forth above, it is respectfully requested that the Commission grant this Motion for Admission Pro Hac Vice and that Ms. Grace C. Wung be admitted to practice before this Commission for the above-captioned proceeding.

Respectfully submitted,

Douglas M Mancino (0005355) McDermott Will & Emery LLP

2049 Century Park East

Suite 3800

Los Angeles, CA 90067-3218 Telephone: (310) 551-9323

Fax: (310) 277-4730 dmancino@mwe.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Admission Pro Hac Vice of Grace Wung was served upon the following parties of record this 9th day of September, 2008, via first class mail, postage prepaid.

Douglas M Mancine

FirstEnergy List: 08-917-EL-SSO

Howard Petricoff Stephen M. Howard M. Petricoff Vorys, Sater, Scymour and Pease LLP 52 East Gay Street Columbus, OH 43215	David Boehm, Esq. Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202-4454
Brett E. Breitschwerdt Teresa Orahood Bricker & Eckler LLP 100 South Third Street Columbus, OH 43215	Jacqueline Roberts, Esq. Ohio Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, OH 43215
Kevin Schmidt 33 North High Street Columbus, OH 43215	John Orr VP Regulatory Affairs Contellation Energy Commodities Group, Inc. 111 Market Place, 5th Floor Baltimore, MD 21202
Nolan Moser The Ohio Environmental Council 1207 Grandview Avenue, Suite 201 Columbus, OH 43212	Langdon D. Bell Barth E. Royer Bell & Royer Co., LPA 33 South Grant Avenue Columbus, OH 43215
Cynthia A. Fonner David I. Fein Constellation Energy Group, Inc. 550 W. Washington Street, Suite 300 Chicago, IL 60661	Eric Stephens 5400 Frantz Road Suite 250 Dublin, OH 43016
Lisa McAlister Daniel J. Neilsen, Esq. Samuel C. Randazzo, General Counsel Joseph M. Clark McNees, Wallace & Nurick 21 East State Street, 17th Floor Columbus, OH 43215-4228	Gary A. Jeffries 501 Martindale Street Suite 400 Pittsburgh, PA 15212-5817

Bobby Singh 300 West Wilson Bridge Road Suite 350 Worthington, OH 43085	Mark S. Yurick, Esq. John Bentine, Esq. Matthew S. White, Esq. Chester Wilcox & Saxbe LLP 65 East State Street Suite 1000
Denis George 1014 Vine Street, G-07 Cincinnati, OH 45202-1100	Craig G. Goodman National Energy Marketers Association 3333 K Street, NW, Suite 110 Washington, DC 20007
Henry Eckhart, Esq. 50 West Broad Street, Suite 2117 Columbus, OH 43215-3301	Michael R. Smalz Ohio State Legal Service Association 555 Buttles Avenue Columbus, OH 43215
Garrett A. Stone, Esq. Michael K. Lavanga, Esq. Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, NW 8th Floor, West Tower Washington, DC 20007	Jeffrey Small Michael E. Idzkowski Maureen Grady Terry Etter Ohio Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, OH 43215-3485
Dale Arnold Director, Energy Services Ohio Farm Bureau Federation, Inc. P.O. Box 182383 Columbus, OH 43218	Larry Gearhardt Ohio Farm Bureau Federation, Inc. 280 N. High Street P.O. Box 479 Columbus, OH 43216
Richard L. Sites 155 E. Broad Street 15th Floor Columbus, OH 43215-3620	David C. Rinebolt Ohio Partners for Affordable Energy 231 W. Lima Street Findlay, OH 45839-1793
Ohio Manufacturers Association 33 N. High Street Columbus, OH 43215	Natural Resources Defense Council 101 N Wacker Drive, Suite 609 Chicago, IL 60606

Selwyn J. R. Dias 88 E. Broad Street Suite 800 Columbus, OH 43215 Daniel Conway Porter Wright Morris & Arthur LLP 41 South High Street Columbus, OH 43215	Marvin Resnik American Electric Power Serv. Corporation 1 Riverside Plaza, 29th Floor Columbus, OH 43215 Steven T. Nourse Senior Counsel American Electric Power Company 1 Riverside Plaza Columbus, OH 43215
Scott Debroff, Esq. Stephen J. Romeo, Esq. Smigel, Anderson & Sacks River Chase Center 4331 North Front Street Harrisburg, PA 17110	Emma F. Hand, Esq. Ethan E. Ril, Esq. Presley R. Reed, Esq. Clinton A. Vince, Esq. Sonnenschein Nath & Rosenthal 1301 K Street, NW Suite 600, East Tower Washington, DC 20005
Benjamin Edwards, Esq. Attorney at Law One East Livingston Avenue Columbus, OH 43215	American Wind Energy Association 1101 14th Street, NW, 12th Floor Washington, DC 20005
Consumer Powerline 17 State Street, 19th Floor New York, NY 10004	Michael S. Adcock Ormet Primary Aluminum Corp. P.O. Box 176 Hannibal, OH 43931
Wind on the Wires 1619 Dayton Avenue, Suite 203 Saint Paul, MN 55104	