

FILE

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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the)
Columbus Southern Power Company for)
Approval of its Electric Security Plan; an)
Amendment to its Corporate Separation Plan;)
And the Sale or Transfer of Certain Generating)
Assets)

Case No. 08-917-EL-SSO

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.

II. 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

¹ At this time the Commercial Group includes Wal-Mart 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.

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(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.


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III. CONCLUSION

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.

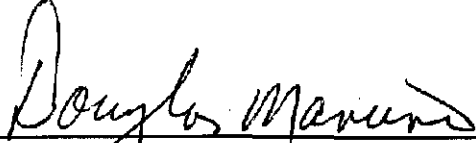
Respectfully submitted,



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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. Mancino

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