#### BEFORE



## THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to R.C. § 4928.143 in the form of an Electric Security Plan

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Establish and SSO Price Under a Market Rate Offer Pursuant to R.C. § 4928.142

Case No. 08-935-EL-SSO

Case No. 08-936-EL-SSO

### MOTION FOR ADMISSION PRO HAC VICE **OF GRACE C. 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 and Sam's East, Inc. (together, "Wal-Mart"), Macy's Inc. ("Macy's"), and BJ's Wholesale Club, Inc. ("BJ's Wholesale Club") (collectively, the "Commercial Group")<sup>1</sup> in the above-captioned cases. The basis for this motion is more fully set forth in the below Memorandum in Support.

> This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business Pechnician Date Processed -11.08

<sup>&</sup>lt;sup>1</sup> At this time the Commercial Group includes Wal-Mart, BJ's Wholesale Club, 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.

### 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.<sup>2</sup>, which represents the Commercial Group. Ms. Wung is an active member of and is licensed in the District of Columbia (Bar No. 498649), Maryland (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:

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#### III. <u>CONCLUSION</u>

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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<sup>&</sup>lt;sup>2</sup> 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.

# **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Admission Pro Hac Vice of Grace C. 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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