FILE

## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan	) ) Case Nos. 08-1094-EL-SSO
In the Matter of the Application of	) )
The Dayton Power and Light Company for	)
Approval of Revised Tariffs	) Case Nos. 08-1095-EL-ATA
In the Matter of the Application of	) )
The Dayton Power and Light Company for	)
Approval of Certain Accounting Authority	) Case Nos. 08-1096-EL-AAM
Pursuant to Ohio Rev. Code § 4905.13	)
In the Matter of the Application of	)
The Dayton Power and Light Company for	) Case Nos. 08-1097-EL-UNC
Approval of Its Amended Corporate	j
Separation Plan	j
	j j
	)

## MOTION FOR ADMISSION PRO HAC VICE OF CYNTHIA A. FONNER

Pursuant to Rule 4901-1-08(B) of the Ohio Administrative Code, M. Howard Petricoff, an attorney licensed to practice in the State of Ohio, respectfully moves that Cynthia A. Fonner be admitted *pro hac vice* to practice before the Public Utilities Commission of Ohio (the "Commission") for the purpose of representing Constellation NewEnergy, Inc. ("CNE") and Constellation Energy Commodities Group, Inc. ("CCG") in the instant matters, and in support thereof, states as follows:

1. Cynthia A. Fonner is Senior Counsel for Constellation Energy Group, Inc., the parent company of CNE and CCG. Ms. Fonner is admitted to, and a member in good standing This is to certify that the images appearing are an accurate and complete reproduction of a case file

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of, the Bar of the State of Illinois, as well as the U.S. District Court, Northern District of Illinois Trial Bar. Ms. Fonner is an experienced practitioner in the field of utility regulation who has appeared in numerous proceedings before state regulatory bodies. Ms. Fonner is familiar with the issues involved in this litigation.

2. Contact information for Ms. Fonner is as follows:

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Ms. Fonner is in-house counsel for CNE and CCG. Her expertise in the regulation of electricity and knowledge concerning the operation of CNE and CEG will be of great assistance to CNE and CCG in its participation in the matter at bar.

WHEREFORE, M. Howard Petricoff respectfully requests that Cynthia A. Fonner be permitted to practice before the Commission in the above styled proceedings.

Respectfully Submitted,

M. Howard Petricoff (0008287)

Wo are

Stephen M. Howard (0022421)

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Attorneys for Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 6th day of November, 2008 by electronic mail or, where indicated, by regular U.S. mail, postage prepaid, upon the persons listed below.

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