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PUCO

January 12, 2009

Public Utilities Commission of Ohio Docketing Division 180 East Broad Street Columbus, Ohio 43215-3793

Re:

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of Rider FUEL and Related Accounting

Authority

Case No. 09-21-EL-ATA, Case No. 09-22-EL-AEM, and Case No.

09-23-EL-AAM

To Whom It May Concern:

Enclosed please find the original and fifteen (15) copies of the *Motion To Admit Theodore S.* Robinson To Practice Pro Hac Vice Before the Commission submitted for filing in the above-captioned proceedings.

Please return a time-stamped copy to me in the enclosed envelope.

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Sincerely,

William M. Ondrey Gruber

Attorney-at-Law

(Registration No. 0005950)

2714 Leighton Road

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(216) 371-3570

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BE THE PUBLIC UTILITIE	FORE S COMMI	ISSION OF OHIO PUCO	
In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of Rider FUEL and Related Accounting Authority))))	Case No. 09-21-EL-ATA Case No. 09-22-EL-AEM Case No. 09-23-EL-AAM	
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MOTION TO ADMIT THEODORE S. ROBINSON TO PRACTICE PRO HAC VICE BEFORE THE COMMISSION

I. MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 4901-1-08(B) of the Ohio Administrative Code, William M. Ondrey Gruber (Attorney Registration No. 0005950), an attorney licensed to practice in the State of Ohio, respectfully petitions the Public Utilities Commission of Ohio ("Commission") to permit Theodore S. Robinson to practice *pro hac vice* before the Commission in the above-referenced proceedings. Mr. Robinson represents Citizen Power, a non-profit corporation registered in Ohio and Pennsylvania and working for safe, clean and affordable energy.

II. <u>MEMORANDUM IN SUPPORT</u>

Mr. Robinson graduated from the University of Pittsburgh School of Law in May 2006, cum laude, and has been an active member of the Pennsylvania Bar since December of 2006, Member No. 203852. Mr. Robinson's representation of Citizen Power includes the support of Citizen Power's activities related to the State of Ohio's

utility services, including those relating to activities over which the Commission has jurisdiction. Mr. Robinson's contact information is:

Theodore S. Robinson Citizen Power, Inc. 2121 Murray Avenue Pittsburgh, PA 15217 Tel: (412) 421-7029

Tel: (412) 421-7029 Fax: (412) 421-6162

robinson@citizenpower.com

III. <u>CONCLUSION</u>

For the reasons set forth above, William M. Ondrey Gruber requests that Theodore S. Robinson be permitted to practice before the Commission in the aforementioned proceedings.

Respectfully submitted,

William M. Ondrey Grub

Attorney-at-Law

(Registration No. 0005950)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Admit Pro Hac Vice* was served on the persons stated below, via First Class U.S. Mail, postage prepaid, this 12th day of January, 2009.

William M. Ondrey Grube

SERVICE LIST

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