

**FILE**  
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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 Approval of )  
Residential Renewable Energy Credit )  
Purchase Program Agreement )

Case No. 09-551-EL-REN

**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 (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. MEMORANDUM IN SUPPORT**

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

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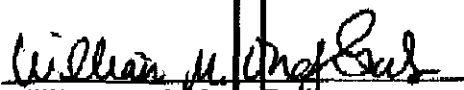
Power includes the support of Citizen Power's activities related to the State of Ohio's utility services, including those relating to activities that the Commission has jurisdiction over. Mr. Robinson's contact information is:

Theodore S. Robinson  
Citizen Power, Inc.  
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Pittsburgh, PA 15217  
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### III. CONCLUSION

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,

  
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