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Exelon

Sandy I. Grace, Esq.
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Exelon Corporation
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March 11, 2011

Public Utilities Commission of Ohio
Docketing Division
180 E. Broad Street, 10th Floor
Columbus, OH 43215

PUCC

2011 MAR 14 AM 8:48

RECEIVED-DOCKETING DIV

Re: Case Nos. 11-346-EL-SSO; 11-348-EL-SSO; 11-349-EL-AAM; 11-350-EL-AAM

Dear Sir/Madam:

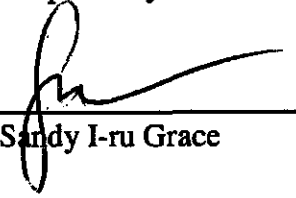
Please find enclosed the following for filing in the above referenced matter:

- i) the original and twelve (12) copies of Exelon Generation Company, LLC's Motion to Intervene and Memorandum in Support;
- ii) the original and twelve (12) copies of the Motion to Admit Sandy I-ru Grace to Practice *Pro Hac Vice Instante* Before the Commission;
- iii) the original and twelve (12) copies of the Motion to Admit Jesse Rodriguez to Practice *Pro Hac Vice Instante* Before the Commission.
- iv) (4) extra copies of the foregoing, to be date-stamped and returned in the enclosed self-addressed, stamped envelope.

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.
Technician Am Date Processed 3/14/11

Please place these documents on file, date stamp the extra copies, and return them in the self-addressed stamped envelope.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be "Sandy I-ru Grace", written over a horizontal line.

Sandy I-ru Grace

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application Columbus)	
Southern Power Company and Ohio Power)	Case Nos. 11-346-EL-SSO
Company for Authority to Establish a Standard)	11-348-EL-SSO
Service Offer Pursuant to § 4928.143, Ohio)	
Rev. Code, in the Form of an Electric Security)	
Plan.)	

**MOTION TO ADMIT SANDY I-RU GRACE TO PRACTICE
PRO HAC VICE INSTANTER BEFORE THE COMMISSION**

Pursuant to Gov. Bar. XII(2)(A)(6), Sandy I-ru Grace, attorney for Exelon Corporation, hereby moves the Public Utilities Commission of Ohio (the "Commission") to grant her the permission to appear *pro hac vice instanter* and participate as co-counsel in the above-captioned proceeding.

Movant represents that the following is a list of jurisdictions in which she has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

- i) District of Columbia #495746, admitted on January 9, 2006; and
- ii) State of Maryland #9906240141 admitted on June 24, 1999

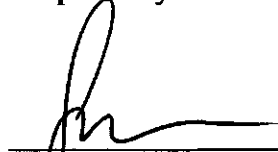
Movant represents that she has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov. Bar R. XII(2)(A)(5).

Constance Whyte Reinhard #0008862, an attorney licensed to practice in the State of Ohio in good standing, has agreed to associate with Movant in this proceeding.

Pursuant Gov. Bar R. XII(3), a copy of the affidavit required by Gov. Bar R. XII(2)(A)(6), along with confirmation that the affidavit has been mailed to the Supreme Court of Ohio's Office of Attorney Services, is included herewith. Movant is providing the Commission a copy of Movant's Certificate of *Pro Hac Vice* Registration. Additionally, a certificate indicating service of this Motion on all known parties and attorneys of record is attached. Movant understands that, if this Motion is granted, Movant must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Office of Attorney Services within thirty days of the Order.

WHEREFORE, Sandy I-ru Grace respectfully moves the Commission for permission to appear *pro hac vice instant* before the Commission in the limited instance of this proceeding.

Respectfully submitted,



Sandy I-ru Grace
PHV #1122-2011
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6511 Wiscasset Rd
Bethesda, MD 20816

March 11, 2011

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Sandy Grace

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2011

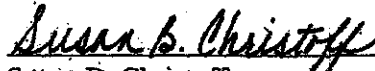
Registration Number:

PHV- 1122-2011

Sandy Grace

, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

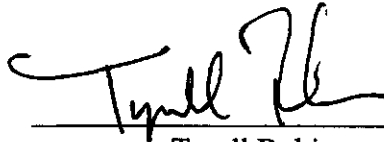


Susan B. Christoff
Director, Attorney Services

Expires December 31, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy via electronic mail (where available) and by first-class postage prepaid mail, to all parties on this 11th day of March, 2011.



Tyrell Robinson

Thomas W. McNamee Assistant Attorney General Public Utilities Section 180 East Broad Street, 6 th Floor Columbus, Ohio 43215-3793	Frank Darr McNees Wallace & Nurick LLC 21 East State Street, 17 th Floor Columbus OH 43215
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Paulding Wind Farm LLC Steve Howard, Atty 52 East Gay St. P O Box 1008 Columbus, OH 43215	Ohio Manufacturers' Association 33 N High Street Columbus, OH 43215

*Indicates that party has agreed to be automatically served via electronic mail.