

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Seeking)	
Approval of Ohio Power Company's)	
Proposal to Enter into an Affiliate)	Case No. 14-1693-EL-RDR
Power Purchase Agreement for)	
Inclusion in the Power Purchase)	
Agreement Rider)	
)	
In the Matter of the Application of)	
Ohio Power Company for Approval of)	Case No. 14-1694-EL-AAM
Certain Accounting Authority)	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar R. XII(2)(A)(6), Michael C. Soules, PHV No. 5615-2015, attorney for Sierra Club, respectfully moves the Public Utilities Commission of Ohio to grant him permission to appear *pro hac vice* and participate as co-counsel in this case representing the Sierra Club in the above-captioned proceeding.

Richard C. Sahli, an active Ohio attorney in good standing, agrees to associate with Movant Michael C. Soules for this case. Mr. Sahli is Sierra Club's counsel of record in this matter. Mr. Sahli's office address is Richard Sahli Law Office, LLC, 981 Pinewood Lane, Columbus, Ohio 43230-3662. Mr. Sahli's office phone number is (614) 428-6068. Mr. Sahli's Ohio Supreme Court Registration Number is 0007360.

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

- District of Columbia (477911, admitted 11/12/04)
- Michigan (P66312, admitted 11/26/03)
- Minnesota (0387936, admitted 10/26/07)
- Colorado (43474, admitted 9/12/11, voluntarily withdrew in Jan. 2015)
- Hawaii (009142, admitted 7/31/09)
- U.S. District Court for the District of Colorado (admitted 6/24/11)
- U.S. District Court for the District of Minnesota (0387936, admitted 1/9/08)
- U.S. Court of Appeals, Ninth Circuit (admitted 8/21/06)
- U.S. District Court for the Eastern District of Wisconsin (admitted 3/29/10)
- U.S. Court of Appeals, Seventh Circuit (admitted 10/8/10)
- U.S. Court of Appeals, Tenth Circuit (admitted 5/14/13)

Movant represents that he 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). As required by Gov. Bar R. XII(2)(A)(6)(a), Movant has supplied his office address and the name and address of his employer below, and states that his residential address is 2138 California Street NW #502, Washington, DC 20008.

A copy of the affidavit required by Gov. Bar R. XII(2)(A)(6), a copy of Movant's certificate of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if this Motion is granted, he must file a Notice of Permission to Appear Pro Hac Vice and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

Respectfully submitted,

Dated: 8/20/2015

/s/ Michael C. Soules
 Michael Soules
 Earthjustice
 1625 Massachusetts Ave. NW
 Suite 702

Washington, DC 20036
(202) 797-5237
(202) 667-2356 (fax)
msoules@earthjustice.org

CERTIFICATE OF SERVICE

I herby certify that I sent by email a copy of this *Motion for Permission to Appear Pro Hac Vice* to the individuals listed on PUCO's Electronic Filing System for Case No. 14-1693-EL-RDR and 14-1694-EL-AAM on this 20th day of August, 2015.

/s/ Richard C. Sahli
Richard C. Sahli #0007360

PERSONS SERVED

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	Attorney Examiners: <u>Sarah.Pattot@puc.state.oh.us</u> <u>Greta.see@puc.state.oh.us</u>
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IN THE MATTER OF THE MOTION OF

14-1693-EL-RDR,
CASE NO. 14-1694-EL-AAM (P.U.C.O.)

Michael C. Soules

FOR PERMISSION TO APPEAR PRO HAC VICE

AFFIDAVIT OF
OUT-OF-STATE ATTORNEY
Gov. Bar R. XII, Section 2(A)(6)

Michael C. Soules being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdictions (attach additional jurisdictions if necessary):

District of Columbia (477911, 11/12/04)

Minnesota (0387936, 10/26/07)

(Withdrew, Jan. 2015) (Please see the
note about my Colorado Bar membership
on the additional page)

Michigan (P66312, 11/26/03)

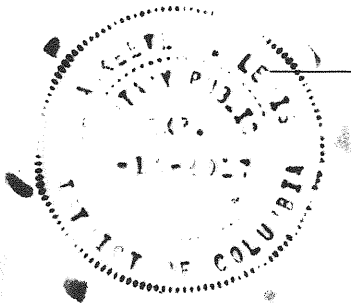
Colorado (43474, 9/12/11)

c. Choose one:

- ☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
- ☐ I am currently suspended from the practice of law in the following jurisdictions:

d. Choose one:

- ☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
- ☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):



Michael C. Soules

SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 18th day of August,

20 15, in the state of District of Columbia and county of _____.

MARKEETE W. LEWIS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 14, 2017

Markeete W. Lewis

SIGNATURE OF NOTARY PUBLIC*

*Affix stamp & seal (required in Ohio).

Affidavit of Michael C. Soules

I have been admitted to the practice of law in the following additional jurisdictions:

U.S. District Court for the District of Colorado (6/24/11)

U.S. District Court for the District of Minnesota (0387936, 1/9/08)

U.S. Court of Appeals, Ninth Circuit (8/21/06)

Hawaii (009142, 7/31/09)

U.S. District Court for the Eastern District of Wisconsin (3/29/10)

U.S. Court of Appeals, Seventh Circuit (10/8/10)

U.S. Court of Appeals, Tenth Circuit (5/14/13)

Note: As stated on the first page of my affidavit, I was admitted to the State Bar of Colorado on September 12, 2011. I was a member in good standing of that Bar until January 2015, when I voluntarily withdrew because I no longer practice in Colorado.

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Michael Soules

FOR PRO HAC VICE REGISTRATION

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

Certificate of
PRO HAC VICE
REGISTRATION

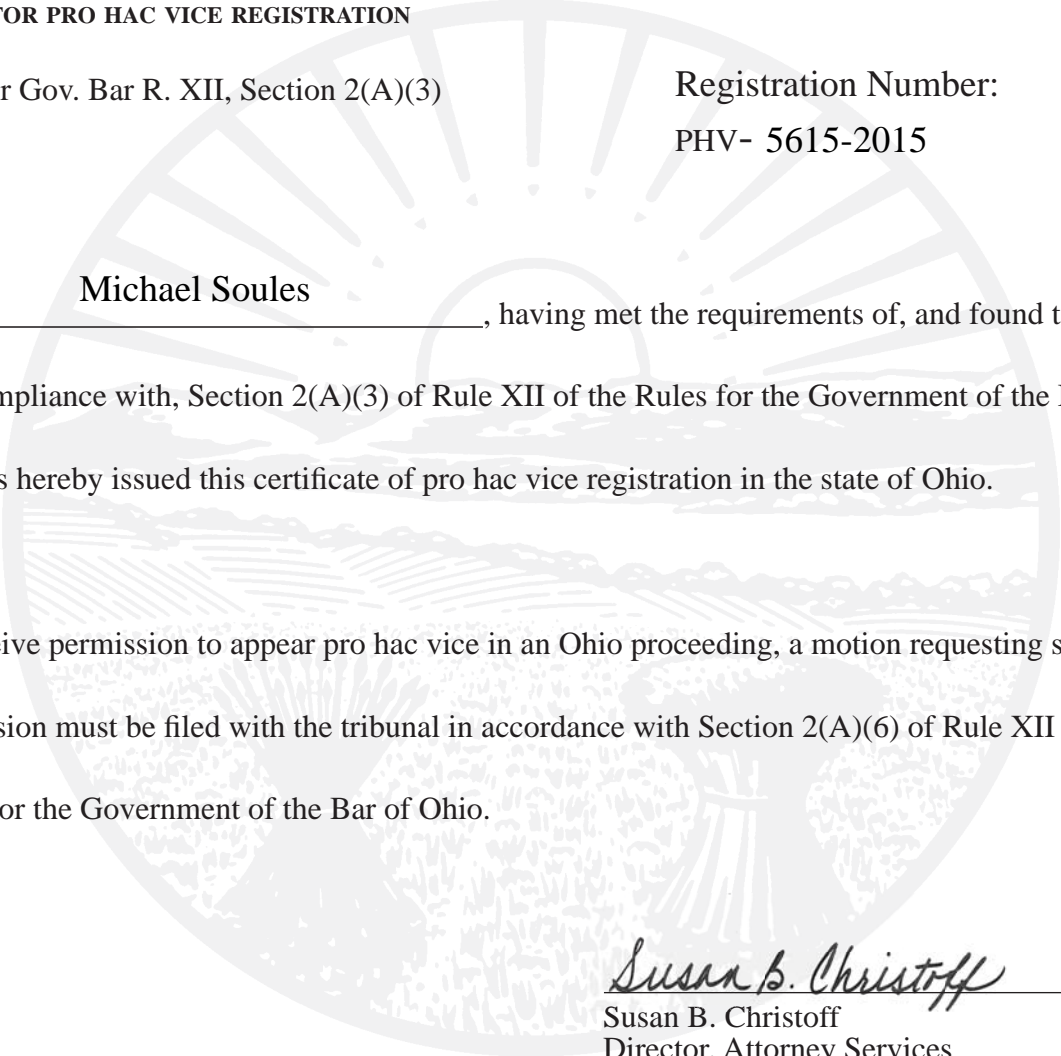
2015

Registration Number:
PHV- 5615-2015

Michael Soules

_____, 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

Susan B. Christoff
Director, Attorney Services

Expires December 31, 2015

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/20/2015 9:40:08 AM

in

Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM

Summary: Motion for Permission to Appear Pro Hac Vice for Michael Soules electronically filed by Mr. Richard C. Sahli on behalf of Sierra Club