**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| **In the Matter of the Complaint and Request For Emergency Interim Relief by Dynegy Marketing and Trade, LLC Against the Northeast Ohio Public Energy Council** | **)**  **)**  **)**  **)**  **)** | **Case No. 22-0817-EL-CSS** |

**Motion for permission to appear pro hac vice**

Pursuant to Gov. Bar. R. XII(2)(A)(6) and Ohio Adm.Code 4901-1-08(B), Transalta Energy Marketing (U.S.) Inc. hereby moves the Public Utilities Commission of Ohio to grant Ms. Kimberly Brickell Frank, attorney for Transalta Energy Marketing (U.S.) Inc., permission to appear *pro hac vice* and participate as counsel for Transalta Energy Marketing (U.S.) Inc. in the above-captioned proceeding. Ms. Frank’s contact information is as follows:

Kimberly B. Frank

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The following is a list of the jurisdictions in which Ms. Frank has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

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| 1. Maryland | License No. 0406150043 | Admitted June, 15, 2004 |
| 2. District of Columbia | License No. 491674 | Admitted March 7, 2005 |

Ms. Frank 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).

The undersigned, Ms. Jannessa Glen (0100782), an active Ohio attorney in good standing and attorney for Transalta Energy Marketing (U.S.) Inc., agreed to associate with Ms. Frank on this case.

The affidavit required by Gov. Bar. R. XII(2)(A)(6), a copy of Ms. Frank’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. It is understood that, if this Motion is granted, Ms. Frank 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 (30) days of the order.

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| |  |  | | --- | --- | | September 27, 2022 | Respectfully submitted,  /s/ Janessa Glenn  Janessa Glenn (0100782)  K&L Gates LLP  2801 Via Fortuna, Suite 650  Austin, Texas 78746-7568  Tel: 512-482-6866  Fax: 512-482-6859  Email: janessa.glenn@klgates.com  Kimberly B. Frank  PHV-26301-2022  *(pro hac admission pending)*  K&L Gates LLP  1601 K Street, NW  Washington, DC 20006  Tel: 202-778-9064  Fax: 202-778-9100  [kimberly.frank@klgates.com](mailto:kimberly.frank@klgates.com)  6100 Massachusetts Avenue  Bethesda, MD 20816  *Attorneys for Transalta Energy Marketing (U.S.) Inc.*  **WILLING TO ACCEPT SERVICE BY E-MAIL** | |  |