

**FILE****BEFORE****THE PUBLIC UTILITIES COMMISSION OF OHIO****RECEIVED**

SEP 09 2008

DOCKETING DIVISION  
Public Utilities Commission of Ohio

In the Matter of the Application of Ohio  
Edison Company, The Cleveland Electric  
Illuminating Company, and The Toledo  
Edison Company for Authority to  
Establish a Standard Service Offer  
Pursuant to R.C. § 4928.143 in the form  
of an Electric Security Plan

Case No. 08-935-EL-SSO

In the Matter of the Application of Ohio  
Edison Company, The Cleveland Electric  
Illuminating Company and The Toledo  
Edison Company for Authority to  
Establish and SSO Price Under a Market  
Rate Offer Pursuant to R.C. § 4928.142

Case No. 08-936-EL-SSO

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**MOTION FOR ADMISSION PRO HAC VICE  
OF GRACE C. WUNG**

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**I. MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Ohio Administrative Code ("OAC") 4901-01-08(B) Douglas M. Mancino, an attorney licensed to practice law in the State of Ohio hereby moves the Commission to permit Grace C. Wung to appear and participate as counsel for Wal-Mart Stores East, LP and Sam's East, Inc. (together, "Wal-Mart"), Macy's Inc. ("Macy's"), and BJ's Wholesale Club, Inc. ("BJ's Wholesale Club") (collectively, the "Commercial Group")<sup>1</sup> in the above-captioned cases. The basis for this motion is more fully set forth in the below Memorandum in Support.

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<sup>1</sup> At this time the Commercial Group includes Wal-Mart, BJ's Wholesale Club, and Macy's, but it anticipates that additional commercial customers will join the group. The Commercial Group will make the appropriate filings at the time additional commercial customers are added to the Commercial Group.

## **II. MEMORANDUM IN SUPPORT**

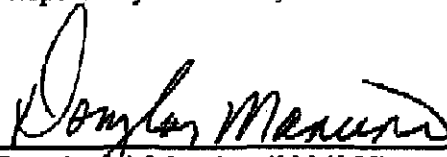
Ms. Wung is an attorney, in good standing, with the law firm of McDermott Will & Emery, LLP, located in Washington, D.C.<sup>2</sup>, which represents the Commercial Group. Ms. Wung is an active member of and is licensed in the District of Columbia (Bar No. 498649), Maryland (Attorney No. 0312170387), and the Commonwealth of Massachusetts (Bar No. 664565). Ms. Wung has participated in proceedings addressing energy and utilities in various states. Ms. Wung's contact information is:

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## **III. CONCLUSION**

For the reasons set forth above, it is respectfully requested that the Commission grant this Motion for Admission Pro Hac Vice and that Ms. Grace C. Wung be admitted to practice before this Commission for the above-captioned proceeding.

Respectfully submitted,

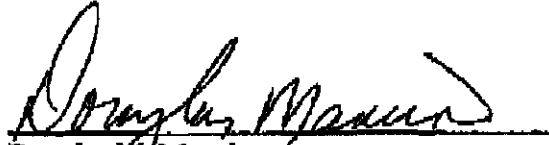


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<sup>2</sup> As of September 1, 2008, Ms. Wung transferred from the Boston, Massachusetts office of McDermott Will & Emery LLP and is currently in the process of updating each of the jurisdictions in which she is licensed of her new address and contact information.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Admission Pro Hac Vice of Grace C. Wung was served upon the following parties of record this 9th day of September, 2008, via first class mail, postage prepaid.

  
Douglas M. Mancino

**FirstEnergy List: 08-935-EL-SSO; 08-936-EL-SSO**

|                                                                                                                                          |                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Harvey L. Wagner<br>76 S. Main Street<br>Akron, OH 44308                                                                                 | Arthur Korkosz, Senior Attorney<br>James Burk, Esq.<br>Mark A. Hayden<br>Ebony L. Miller, Esq.<br>First Energy Service Company<br>76 South Main Street<br>Akron, OH 44308-1890 |
| Howard Petricoff<br>Stephen M. Howard<br>M. Petricoff<br>Vorys, Sater, Seymour and Pease LLP<br>52 East Gay Street<br>Columbus, OH 43215 | David Boehm, Esq.<br>Boehm, Kurtz & Lowry<br>36 East Seventh Street, Suite 1510<br>Cincinnati, OH 45202-4454                                                                   |
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| Gary Reese<br>Director of Environmental Service<br>Memorial Hospital of Union County<br>Marysville, OH 43040                             | Steven Beeler<br>Assistant Director of City of Cleveland<br>Department of Law<br>601 Lakeside Avenue, Room 106<br>Cleveland, OH 44114                                          |

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| Nolan Moser<br>The Ohio Environmental Council<br>1207 Grandview Avenue, Suite 201<br>Columbus, OH 43212                                                                                        | Gregory H. Dunn, Esq.<br>Andre T. Porter, Esq.<br>Christopher L. Miller<br>Schottenstein Zox & Dunn Co., LPA<br>250 West Street<br>Columbus, OH 43215 |
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| Barth E. Royer<br>Bell & Royer Co., LPA<br>33 South Grant Avenue<br>Columbus, OH 43215-3927                                                                                                                    | F. Mitchell Dutton<br>FPL Energy Power Marketing Inc.<br>700 Universe Boulevard Ctr/JB<br>Juno Beach, FL 33408             |
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| Henry Eckhart, Esq.<br>50 West Broad Street, Suite 2117<br>Columbus, OH 43215-3301                                                                                                                             | Glenn Krassen, Esq.<br>Bricker & Eckler LLP<br>1375 East Ninth Street, Suite 1500<br>Cleveland, OH 44114-1718              |
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| Richard L. Sites<br>155 E. Broad Street<br>15th Floor<br>Columbus, OH 43215-3620                                                                                                                               | David C. Rinebolt<br>Ohio Partners for Affordable Energy<br>231 W. Lima Street<br>Findlay, OH 45839-1793                   |

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| Northwest Ohio Aggregation Coalition<br>One Government Center, Suite 2250<br>Toledo, OH 43604                                      | Nucor Steel Marion, Inc.<br>912 Cheney Avenue<br>Marion, OH 43302                                                       |
| Ohio Manufacturers Association<br>33 N. High Street<br>Columbus, OH 43215                                                          | Natural Resources Defense Council<br>101 N. Wacker Drive, Suite 609<br>Chicago, IL 60606                                |
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