

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 an Experimental Critical Peak )  
Rider, a revised Generation Service Rider )  
which includes a Time-of-Day Option, and an )  
Experimental Real Time Pricing Rider )

Case No. 09-0541-EL-ATA

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**MOTION FOR ADMISSION PRO HAC VICE  
OF  
GARRETT A. STONE AND MICHAEL K. LAVANGA**

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

Pursuant to Ohio Administrative Code ("OAC") 4901-1-08(B), John W. Bentine, an attorney licensed to practice law in the State of Ohio hereby moves the Commission to permit Garrett A. Stone and Michael K. Lavanga to appear and participate as counsel for Nucor Steel Marion, Inc. ("Nucor Marion") in the above-captioned cases. The basis for this motion is more fully set forth in the below Memorandum in Support.

**II. MEMORANDUM IN SUPPORT**

Messrs. Stone and Lavanga are attorneys with the law firm of Brickfield, Burchette, Ritts & Stone, P.C. located in Washington, D.C, which represents Nucor Corporation, the parent of Nucor Marion, nationwide in electric supply related matters. Mr. Stone is an active member of the District of Columbia Bar, Bar No. 398128, and Mr. Stone has been licensed to practice law in Colorado, and before the United States District Court for the District of Colorado, and the United

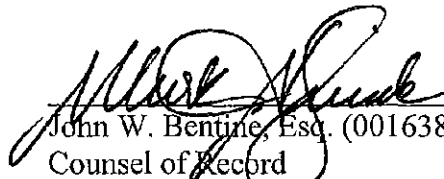
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States Court of Appeals for the Tenth Circuit.<sup>1</sup> Mr. Lavanga is an active member of the District of Columbia, Bar No. 473955, and is also a member of the Virginia state bar. Messrs. Stone and Lavanga have participated in proceedings addressing energy and utility matters in various states over many years, including numerous proceedings before this Commission.

### III. CONCLUSION

For the reasons set forth above, Nucor Marion respectfully requests the Commission to grant the above Motion for Admission Pro Hac Vice.

Respectfully submitted,



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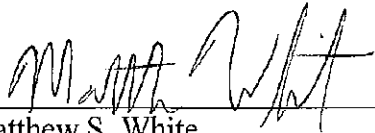
ND: 4838-0151-3476, v. 1

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<sup>1</sup> Mr. Stone's Colorado membership is currently inactive at his election.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Motion for Admission Pro Hac Vice of Garrett A. Stone and Michael K. Lavanga* of Nucor Steel Marion, Inc. was served via by first-class, postage prepaid U.S. mail, and, where indicated, electronic mail on this 21st day of July, 2009 upon the following:

  
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