

**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV  
2010 MAR 30 PM 2:37  
PUCO

In the Matter of the Application	)	
of Columbus Southern Power	)	
Company to Amend its Emergency	)	
Curtailment Service Riders	)	Case No. 10-343-EL-ATA
In the Matter of the Application	)	Case No. 10-344-EL-ATA
of Ohio Power Company	)	
to Amend its Emergency Curtailment	)	
Service Riders	)	

**MOTION FOR ADMISSION PRO HAC VICE  
OF CYNTHIA FONNER BRADY**

Pursuant to Rule 4901-1-08(B) of the Ohio Administrative Code, M. Howard Petricoff, an attorney licensed to practice in the State of Ohio, respectfully moves that Cynthia Fonner Brady be admitted *pro hac vice* to practice before the Public Utilities Commission of Ohio (the "Commission") for the purpose of representing Constellation NewEnergy, Inc. ("CNE") in the instant matters, and in support thereof, states as follows:

1. Cynthia Fonner Brady is Senior Counsel for Constellation Energy Group, Inc., the parent company of CNE. Ms. Brady is admitted to, and a member in good standing of, the Bar of the State of Illinois, as well as the U.S. District Court, Northern District of Illinois Trial Bar. Ms. Brady is an experienced practitioner in the field of utility regulation who has appeared in numerous proceedings before state regulatory bodies. Ms. Brady is familiar with the issues involved in this litigation.

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 mm Date Processed 03/30/10


2. Contact information for Ms. Brady is as follows:

Cynthia Fonner Brady  
Senior Counsel  
Constellation Energy Group, Inc.  
550 W. Washington St., Suite 300  
Chicago, IL 60661  
312.704.8518 (phone)  
312.704.9286 (fax)  
312.502.6151 (cell)  
[Cynthia.Brady@constellation.com](mailto:Cynthia.Brady@constellation.com)

Ms. Brady is in-house counsel for CNE. Her expertise in the regulation of electricity and knowledge concerning the operation of CNE will be of great assistance to CNE in its participation in the matter at bar.

WHEREFORE, M. Howard Petricoff respectfully requests that Cynthia Fonner Brady be permitted to practice before the Commission in the above styled proceedings.

Respectfully Submitted,



---

M. Howard Petricoff (0008287)  
Stephen M. Howard (0022421)  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 East Gay Street  
P. O. Box 1008  
Columbus, Ohio 43216-1008  
Tel. (614) 464-5414  
Fax (614) 464-6350

Attorneys for Constellation NewEnergy, Inc.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing documents was served this 30<sup>th</sup> day of March, 2010 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.



---

M. Howard Petricoff

Steven T. Nourse  
American Electric Power Service Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215

Jacqueline Lake Roberts  
EnerNOC, Inc.  
13212 Haves Corner Road SW  
Pataskala, OH 43062