

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application)
of Columbus Southern Power)
Company to Amend its Emergency)
Curtailement 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 Curtailement)
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.

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

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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,



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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 30th day of March, 2010 by regular U.S. mail, postage prepaid, or by electronic mail, upon the persons listed below.



M. Howard Petricoff

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