

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	Case Nos. 09-1947-EL-POR
Illuminating Company, and The Toledo)	09-1948-EL-POR
Edison Company For Approval of Their)	09-1949-EL-POR
Energy Efficiency and Peak Demand)	
Reduction Program Portfolio Plans for)	
2010 Through 2012 and Associated Cost)	
Recovery Mechanisms.)	

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	Case Nos. 09-1942-EL-EEC
Illuminating Company, and The Toledo)	09-1943-EL-EEC
Edison Company For Approval of Their)	09-1944-EL-EEC
Initial Benchmark Reports.)	

In the Matter of the Energy Efficiency and)	
Peak Demand Reduction Program)	Case Nos. 09-580-EL-EEC
Portfolio of Ohio Edison Company, The)	09-581-EL-EEC
Cleveland Electric Illuminating Company,)	09-582-EL-EEC
and The Toledo Edison Company.)	

**MOTION TO ADMIT ROBERT KELTER TO PRACTICE
PRO HAC VICE BEFORE THE COMMISSION AND NOTICE OF SUBSTITUTION OF
COUNSEL**

Pursuant to Ohio Administrative Code §4901-1-08(B) of the Ohio Administrative Code, Michael E. Heintz (attorney number 0076264), an attorney licensed to practice in the State of Ohio, respectfully petitions the Commission to permit Robert Kelter to practice *pro hac vice* before the Commission in the above-referenced case. Mr. Kelter represents the Environmental Law & Policy Center, a not-for-profit organization based in Chicago, Illinois, but with an office in Columbus, Ohio. Mr. Kelter received his J.D. from the University of San Diego in 1987. As an active member of the State of Illinois Bar, attorney number 6236307, Mr. Kelter is licensed to practice before the courts of the State of Illinois. Furthermore, Mr. Kelter has practiced law

continuously since being admitted to the State of Illinois bar in 1996, and was admitted to practice in the State of California in 1989. He has previously been admitted to practice *pro hac vice* before this Commission.

Furthermore, and in accordance with Ohio Administrative Code §4901-1-08(G), the Environmental Law & Policy Center, Intervenor in the above captioned action, hereby provides notice to the Commission and all parties of record of the notice of appearance and substitution of the following as its attorney of record:

Robert Kelter
Environmental Law & Policy Center
35 East Wacker Drive
Suite 1600
Chicago, IL 60601
Phone: 312-795-3734
Fax: 312-795-3730
Email: rkelter@elpc.org

Accordingly, service of documents and other matters should now be directed to Robert Kelter and Michael Heintz withdraws as counsel.

Respectfully submitted,

/s Michael E. Heintz
Michael E. Heintz
Environmental Law & Policy Center
1207 Grandview Ave. Suite 201
Columbus, Ohio 43212
Telephone: 614-488-3301
Fax: 614-487-7510
E-mail: mheintz@elpc.org

Attorney for the Environmental Law &
Policy Center

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion to Admit Robert Kelter to Practice *Pro Hac Vice* Before the Commission and Notice of Substitution of Counsel of the Environmental Law & Policy Center has been served upon the following parties, via electronic mail, this 26th day of August, 2010.

/s Michael E. Heintz

Michael Heintz

Kathy J. Kolich
Ebony L. Miller
Arthur E. Korkosz
FirstEnergy Service Company
76 South Main St.
Akron, Ohio 44308
kjkolich@firstenergycorp.com
elmiller@firstenergycorp.com
korkosza@firstenergycorp.com

James F. Lang
Laura C. McBride
N. Trevor Alexander
Kevin P. Shannon
Calfee, Halter, & Griswold, LLP
1400 Key Bank Center
800 Superior Ave.
Cleveland, Ohio 44114
jlang@calfee.com
lmcbride@calfee.com
talexander@calfee.com
kshannon@calfee.com

Counsel for Ohio Edison Company, the
Cleveland Illuminating Company, and the
Toledo Edison Company

Gregory J. Poulos
Christopher J. Allwein
Jeffrey L. Small
Assistant Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
small@occ.state.oh.us
poulos@occ.state.oh.us
allwein@occ.state.oh.us

Duane Luckey
Attorney General's Office
Public Utilities Commission of Ohio
180 E. Broad St., 6th Fl.
Columbus, OH 43216
duane.luckey@puc.state.oh.us

Michael K. Lavanga
Garrett A. Stone
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
8th Floor, West Tower
Washington, D.C. 20007
mkl@bbrslaw.com
gas@bbrslaw.com

Attorneys for Nucor Steel Marion, Inc.

Matthew W. Warnock
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215
mwarnock@bricker.com

Attorney for Ohio Schools Council

Thomas Lindgren
Attorney General's Office
Public Utilities Section
180 East Broad Street 6th Floor
Columbus, OH 43215
Thomas.lindgren@puc.state.oh.us

Will Reisinger
Trent Dougherty
Nolan Moser
1207 Grandview Avenue, Ste. 201
Columbus, OH 43212-3449
will@theOEC.org
trent@theOEC.org
nolan@theOEC.org

Attorneys for Staff the Ohio Environmental
Council

David C. Rinebolt
Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
Findlay, OH 45839-1793
cmooney2@columbus.rr.com
drinebolt@ohiopartners.org

Samuel C. Randazzo
Lisa G. McAlister
Joseph M. Clark
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus, OH 43215
sam@mwncmh.com
lmcalister@mwncmh.com
jclark@mwncmh.com

Attorneys for Industrial Users Energy-Ohio

Joseph P. Meissner
Matthew D. Vincel
The Legal Aid Society of Cleveland
1223 West 6th St.
Cleveland, OH 44113
jpmessin@lasclev.org
mvincel@lasclev.org

Attorney for: Neighborhood
Environmental Coalition, Consumers for
Fair Utility Rates, The Empowerment
Center of Greater Cleveland and Cleveland
Housing Network

Todd Jones
Christopher Miller
Andre Porter
Gregory Dunn
Schottenstein Zox & Dunn Co., LPA
250 West Street
Columbus, OH 43215
cmiller@szd.com
aporter@szd.com
gdunn@szd.com

Attorneys for the AICUO

David F. Boehm, Esq.
Michael L. Kurtz, Esq.
Boehm, Kurtz & Lowry
36 East Seventh St., Ste. 1510
Cincinnati, OH 45202
dboehm@BKLawfirm.com
mkurtz@BKLawfirm.com

Attorneys for the Ohio Energy Group

Theodore Robinson
Staff Attorney and Counsel
Citizen Power
2121 Murray Ave.
Pittsburgh, PA 15217
robinson@citizenpower.com

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Summary: Motion to Admit Robert Kelter to Practice Pro Hac Vice Before the Commission and Notice of Substitution of Counsel electronically filed by Mr. Michael E Heintz on behalf of Environmental Law and Policy Center