

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of Protocols for the            )  
Measurement and Verification of Energy )  
Efficiency and Peak Demand Reduction )  
Measures.    )**

**Case No. 09-512-GE-UNC**

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

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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 U.S. mail, postage prepaid, this 26th day of August, 2010.

/s Michael E. Heintz

Michael Heintz

Marvin I. Resnik  
American Electric Power Service Corp.  
1 Riverside Plaza, 29th Floor  
Columbus, OH 43215

Stephen Seiple  
Columbia Gas of Ohio  
PO Box 117  
Columbus, OH 43215

Jeffrey L. Small  
Office of the Ohio Consumers'  
Counsel  
10 West Broad St., Suite 1800  
Columbus, OH 43215-3485

Nolan Moser  
The Ohio Environmental Council  
1207 Grandview Ave., Suite 201  
Columbus, OH 43212-3449

Kenneth D. Schisler  
EnerNOC, Inc.  
75 Federal St., Suite 300  
Boston, MA 02110

Amy B. Spiller  
Duke Energy Ohio  
139 Fourth St. 25 Atrium II  
Cincinnati, OH 45202

Carolyn Flahive  
Thompson Hine LLP  
10 W. Broad St., Suite 700  
Columbus, OH 43215-3435

Randall V. Griffin  
The Dayton Power & Light  
Company  
1065 Woodman Drive  
Dayton, OH 45432

Elizabeth H. Watts  
Duke Energy Ohio  
PO Box 960  
Cincinnati, OH 45201-0960

Kathy J. Kolich  
FirstEnergy Service Company  
76 South Main St.  
Akron, OH 44308

Samuel C. Randazzo  
McNees Wallace & Nurick  
21 East State St., 17th Floor  
Columbus, OH 43215-4228

David A. Kutik  
Jones Day  
901 Lakeside Avenue  
Cleveland, OH 44114

Mark A. Whitt  
Carpent Lipps & Leland  
280 North High St, Suite 1300  
Columbus, OH 43215

Janet K. Stoneking  
Ohio Department of Development  
PO Box 1001  
Columbus, OH 43216-1001

Teresa Orahoad  
Bricker & Eckler  
100 S. Third St.  
Columbus, OH 43215-4291

Joseph M. Clark  
McNees Wallace & Nurick  
21 East State St., 17th Floor  
Columbus, OH 43215

Amanda Moore  
Environment Ohio  
203 E. Broad St., Suite 3  
Columbus, OH 43215

Dave Rinebolt  
Ohio Partners for Affordable Energy  
231 W Lima St  
PO Box 1793  
Findlay OH 45840-1793

Thomas J. O'Brien  
Bricker & Eckler  
100 South Third St.  
Columbus, OH 43215-4291

Theodore Robinson  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217

Henry Eckhart  
50 West Broad St., Suite 2117  
Columbus, OH 43215

Mary W. Christensen  
Christensen Donchatz Kettlewell & Owen  
100 East Campus View Blvd., Suite 360  
Columbus OH 43235

**This foregoing document was electronically filed with the Public Utilities**

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**Case No(s). 09-0512-GE-UNC**

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