

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of)
Columbus Southern Power Company and) Case Nos. 11-346-EL-SSO
Ohio Power Company for Authority to) 11-348-EL-SSO
Establish a Standard Service Offer Pursuant)
to Section 4928.143, Revised Code, in the)
Form of an Electric Security Plan.)

**MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE* OF
WILLIAM MASSEY**

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 William Massey be admitted *pro hac vice* to practice before the Public Utilities Commission of Ohio (the "Commission") for the purpose of representing The COMPETE Coalition ("COMPETE") in the instant matter, and in support thereof, states as follows:

- a) Mr. Massey's residential address is 1642 21st Street, N.W., Washington, D.C. 20009.
- b) He is employed by the law firm of Covington & Burling, L.L.P., located at 1201 Pennsylvania Ave., N.W., Washington, D.C. 20004.
- c) He was admitted to practice law in Arkansas on September 10, 1973 (#73156) and in Washington, D.C. on October 5, 1992 (#434422).
- d) He has never been disbarred, is not currently under suspension, and there are no discipline proceedings pending against him in any jurisdiction.
- e) Pursuant to Rule XII(2)(A)(5) of the Supreme Court Rules for the Government of the Bar of Ohio, he has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year.

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WHEREFORE, M. Howard Petricoff respectfully requests that William Massey be permitted to practice before the Commission in the above styled proceeding.

Respectfully Submitted,

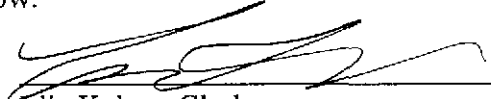


M. Howard Petricoff (0008287)
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
P. O. Box 1008
Columbus, Ohio 43216-1008
Tel. (614) 464-5414
Fax (614) 464-6350
mhpetricoff@vorys.com

Attorney for The COMPETE Coalition

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served this 19th day of July, 2011 by electronic mail, upon the persons listed below.


Lija Kaleps-Clark

Samuel C. Randazzo
Joseph Olikier
Frank P. Darr
McNees, Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215-4228
sam@mwncmh.com
joliker@mwncmh.com
fdarr@mwncmh.com

Mark A. Hayden
FirstEnergy Service Company
76 South Main St.
Akron, OH 44308
haydenm@firstenergycorp.com

Daniel R. Conway
Porter Wright Morris & Arthur
Huntington Center
41 S. High St.
Columbus, OH 43215
dconway@porterwright.com

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

Dorothy K. Corbett
Duke Energy Retail Sales, LLC
2500 Atrium II
P.O. Box 961
Cincinnati, OH 45201-0960
Amy.spiller@duke-energy.com

Steven T. Nourse
Matthew J. Satterwhite
American Electric Power Corporation
1 Riverside Plaza, 29th Floor
Columbus, OH 43215-2373
stnourse@aep.com
mjsatterwhite@aep.com

Terrence O'Donnell
Christopher Montgomery
Bricker & Eckler LLP
100 S. Third St.
Columbus, OH 43215-4291
todonnell@bricker.com
cmontgomery@bricker.com

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

John W. Bentine
Mark Yurick
Chester Willcox & Saxbe, LLP
65 E. State St., Suite 1000
Columbus, OH 43215
jbentine@cwslaw.com
myurick@cwslaw.com

Michael R. Smalz
Joseph V. Maskovyak
Ohio Poverty Law Center
555 Buttlers Ave.
Columbus, OH 43215
msmalz@ohiopoveritylaw.org
jmaskovyak@ohiopoveritylaw.org

Richard L. Sites
Ohio Hospital Association
155 E. Broad St., 15th Floor
Columbus, OH 43215
ricks@ohanet.org

James F. Lang
Laura C. McBride
N. Trevor Alexander
Calfee, Halter & Griswold LLP
1400 KeyBank Center
800 Superior Avenue
Cleveland, OH 44114
jlang@calfee.com
lmcbride@calfee.com
talexander@calfee.com

Terry L. Etter
Michael E. Idzkowski
Maureen R. Grady
Assistant Consumers' Counsel
10 W. Broad St., Suite 1800
Columbus, OH 43215-3485
etter@occ.state.oh.us
idzkowsko@occ.state.oh.us
grady@occ.state.oh.us

Lisa G. McAlister
Matthew W. Warnock
Bricker & Eckler LLP
100 S. Third St.
Columbus, OH 43215-4291
lmcalister@bricker.com
mwarnock@bricker.com

Jay Jadwin
American Electric Power Service Corp.
Riverside Plaza, 29th Floor
Columbus, OH 43215
jejadwin@aep.com

Philip B. Sineneng
Thompson Hine LLP
Huntington Center
41 S. High Street, Suite 1700
Columbus, OH 43215
Philip.sineneng@thompsonhine.com

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

William Massey

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2011

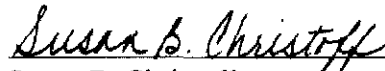
Registration Number:

PHV- 1770-2011

William Massey

_____, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.



Susan B. Christoff
Director, Attorney Services

Expires December 31, 2011

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

William Massey (1770-2011)

FOR PRO HAC VICE REGISTRATION

AFFIDAVIT OF APPLICANT

Gov. Bar R. XII, Section 2(A)(3)

State of Washington)

County of D.C.)

ss:

William L. Massey, being first duly cautioned, swears or affirms as follows:

a. I have never been disbarred from the practice of law.

b. I have been admitted to the practice of law in the following jurisdiction(s)
Arkansas, Washington, DC

c. Choose one:

☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.

☐ I am currently suspended from the practice of law in the following jurisdiction(s):

d. Choose one:

☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.

☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 12th

day of July, 20 11.

MARIA P. CHAVEZ
Notary Public, District of Columbia
My Commission Expires January 14, 2015

NOTARY PUBLIC