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## BEFORE

## THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus	)	
Southern Power Company and Ohio Power	)	
Company for Authority to Establish a Standard	)	Case No. 11-346-EL-SSO
Service Offer Pursuant to Section 4928.143,	)	Case No. 11-348-EL-SSO
Revised Code, in the Form of an Electric	)	
Security Plan.	)	

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**REVISED MOTION TO ADMIT SHANNON FISK TO PRACTICE  
PRO HAC VICE BEFORE THE COMMISSION**

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Pursuant to Ohio Administrative Code §4901-1-08(B), and the Supreme Court of Ohio Rule Gov. Bar XII *pro hac vice*, Henry W. Eckhart, ("Movant") an attorney licensed to practice law in the State of Ohio, respectfully moves by this Revised Motion that the Public Utilities Commission of Ohio ("Commission") permit Shannon Fisk to practice *pro hac vice* before the Commission as Co-Counsel with Henry W. Eckhart, representing the Natural Resources Defense Council and the Sierra Club in Case Numbers 11-346-EL-SSO and 11-348-EL-SSO.

This Revised Motion and the attached Memorandum replace the original Motion and Memorandum previously filed herein on March 25, 2011, on behalf of Shannon Fisk.

**MEMORANDUM IN SUPPORT OF MOTION**

Mr. Fisk is a Senior Attorney for the Midwest Office of the Natural Resources Defense Council, and is licensed to practice law in the State of Illinois. A 1999 graduate of Harvard Law School and former Staff Attorney at the U.S. Court of Appeals for the Seventh Circuit, Mr. Fisk has represented the Natural Resources Defense Council and other organizations in federal and state courts, and in various regulatory proceedings.

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.  
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The Movant previously filed a Motion to Admit Shannon Fisk to Practice *pro hac vice* on March 25, 2011 with the Affidavit of Applicant which had been filed with The Supreme Court of Ohio, Office of Attorney Services, attached as Exhibit A to that Motion. Also attached to that Motion was the Certificate of PRO HAC VICE Registration Number PHV – 1321-2011, marked as Exhibit B. Both Exhibit A and Exhibit B are attached to this Revised Motion and incorporated by reference herein.

The Movant also previously filed herein an Affidavit of Shannon Fisk In Support Of Motion Pro Hac Vice on June 1, 2011. This Movant incorporates by reference the substantive factual statements of that Affidavit.

The Movant herein, Henry W. Eckhart will continue to act as counsel for The Natural Resources Defense Council and the Sierra Club in the following cases: Number 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM and 11-350-EL-AAM.

The undersigned, Henry W. Eckhart, is an active Ohio attorney, in good standing and has agreed to associate himself with Mr. Fisk in these proceedings before the Commission.

WHEREFORE, Henry W. Eckhart respectfully requests that Shannon Fisk be permitted to practice before the Commission in the aforementioned cases Number 11-346-EL-SSO and 11-348-EL-SSO.

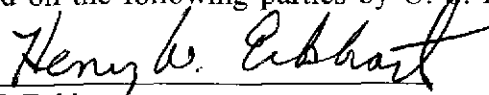
Respectfully submitted,



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## CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Revised Motion has been filed with the Commission and has been served on the following parties by U. S. Postal Service or by e-mail on this 21<sup>st</sup> day of July, 2011.

  
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# THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

**Shannon Fisk (1321-2011)**

FOR PRO HAC VICE REGISTRATION

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

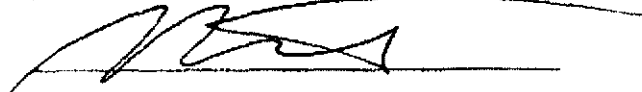
State of Illinois )  
County of Cook )

ss:

Shannon Fisk, 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)  
Illinois
- 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):

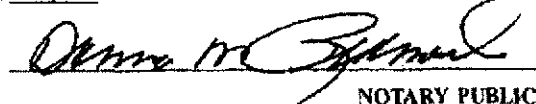
SIGNATURE OF APPLICANT:



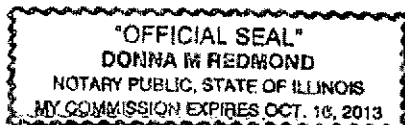
Sworn to or affirmed before me and subscribed in my presence the 22<sup>nd</sup>

day of March, 20 11.

EXHIBIT A



NOTARY PUBLIC



# THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

EXHIBIT B

IN THE MATTER OF THE APPLICATION OF

**Shannon Fisk**

FOR PRO HAC VICE REGISTRATION

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

Certificate of  
PRO HAC VICE  
REGISTRATION

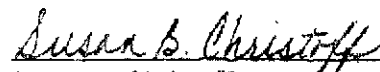
2011

Registration Number:  
PIIV- 1321-2011

Shannon Fisk

, 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

EXHIBIT B