

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo Edison)
Company for Authority to Provide for a) Case No. 14-1297-EL-SSO
Standard Service Offer Pursuant to R.C.)
4928.143 in the Form of an Electric Security)
Plan)

MOTION TO APPEAR PRO HAC VICE OF ROBERT KELTER

Pursuant to R. XII(2)(A)(6), Robert Kelter, attorney for the Environmental Law & Policy Center, hereby moves the Public Utilities Commission of Ohio to grant him permission to appear *pro hac vice* in the above-captioned proceeding.

Movant represents that the following is a list of the jurisdictions in which he has ever been licensed to practice law, including dates of admission to practice, and any attorney registration numbers:

- Illinois, BAR No. 6236307, admission date: December 24, 1996;
- California, BAR No. 139269, admission date: January 1, 1989;
- District of Columbia, BAR No. 422887, admission date: February 23, 1990.

Movant represents that he has not been granted permission to appear *pro hoc vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov.Bar R. XII(2)(A)(5).

Madeleine P. Fleisher, an active Ohio attorney in good standing (Bar No. 0091862), has agreed to associate with Movant on this case.

The affidavit required by Gov.Bar R. XII(2)(A)(6), a copy of Movant's certificate of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services and a certificate indicating services of this Motion on all known parties and attorneys of record are

attached. Movant understands that if this motion is granted, Movant must file a Notice of Permission to Appear *pro hac vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

Dated: December 22, 2015.

Respectfully submitted,

/s Robert Kelter

Robert Kelter

PHV-2685-2015

Senior Attorney

Environmental Law & Policy Center

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IN THE MATTER OF THE MOTION OF

CASE NO. 14-1297-EL-SSO

Robert Kelter

**AFFIDAVIT OF
OUT-OF-STATE ATTORNEY**
Gov. Bar R. XII, Section 2(A)(6)

FOR PERMISSION TO APPEAR PRO HAC VICE

Robert Kelter 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 jurisdictions (attach additional jurisdictions if necessary):

California (139269)

District of Columbia (422887) (inactive)

Illinois (6236307)

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 jurisdictions:

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):

Robert Kelter

SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 22 day of December,
20 15, in the state of Illinois and county of Cook.

Elizabeth Prakel

SIGNATURE OF NOTARY PUBLIC*

*Affix stamp & seal (required in Ohio).



THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Robert Kelter

FOR PRO HAC VICE REGISTRATION

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

Robert Kelter


Certificate of
PRO HAC VICE
REGISTRATION

2015

Registration Number:
PHV- 2685-2015

_____, 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, 2015

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Motion to Appear Pro Hac Vice of Robert Kelter* was served by electronic mail, upon the following Parties of Record, this 22nd day of December, 2015.

/s Robert Kelter
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in

Case No(s). 14-1297-EL-SSO

Summary: Motion Motion to Appear Pro Hac Vice of Robert Kelter electronically filed by Mr. Robert Kelter on behalf of Environmental Law & Policy Center