

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company for Authority to)	
Establish a Standard Service Offer)	Case No. 16-1852-EL-SSO
Pursuant to R.C. 4928.143, in the Form of)	
an Electric Security Plan)	

In the Matter of the Application of Ohio)	
Power Company for Approval of Certain)	Case No. 16-1853-EL-AAM
Accounting Authority.)	

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:

- State of Illinois, BAR No. 6236307, admission date: December 24, 1996;
- State of 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 hac 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: October 27, 2017

Respectfully submitted,

/s/ Robert Kelter
Robert Kelter
PHV-2685-2017
Senior Attorney
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
P: 312-795-3734
F: 312-795-3730
E-mail: rkelter@elpc.org

IN THE MATTER OF THE MOTION OF

CASE NO. 16-1852; 16-1853

Robert Kelter

FOR PERMISSION TO APPEAR PRO HAC VICE

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

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):

Illinois (6236307)

District of Columbia (422887) (inactive)

California (139269) (inactive)

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:

District of Columbia for non-payment of dues

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

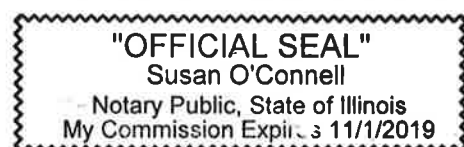
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 27th day of October,
20 17, in the state of Illinois and county of Cook.

Susan O'Connell

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)

Certificate of
PRO HAC VICE
REGISTRATION

2017

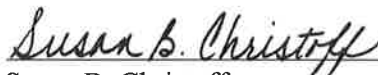
Registration Number:

PHV- 2685-2017

Robert Kelter

_____, 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, 2017

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 27th day of October, 2017.

/s Robert Kelter
Robert Kelter
PHV-2685-2017
Senior Attorney
Environmental Law & Policy Center
35 E. Wacker Drive, Suite 1600
Chicago, IL 60601
P: 312-795-3734
F: 312-795-3730
E-mail: rkelter@elpc.org

Amy.Spiller@duke-energy.com;
campbell@whitt-sturtevant.com;
paul@carpenterlipps.com;
charris@spilmanlaw.com;
cblend@aep.com;
cpirik@dickinsonwright.com;
Christopher.Miller@icemiller.com;
cmooney@ohiopartners.org;
dstinson@bricker.com;
dwilliamson@spilmanlaw.com;
dparram@bricker.com;
dborchers@bricker.com;
ehewell@bricker.com;
egallon@porterwright.com;
Elizabeth.Watts@duke-energy.com;
EAkhbari@bricker.com;
fdarr@mwncmh.com;
Greg.Tillman@walmart.com;
Greta.See@puc.state.oh.us;
glpetrucci@vorys.com;
ibatikov@vorys.com;
perko@carpenterlipps.com;
jeremy.grayem@icemiller.com;
jkylercohn@BKLawfirm.com;
Sechler@carpenterlipps.com;
joe.halso@sierraclub.org;

joliker@igsenergy.com;
Kevin.moore@occ.ohio.gov;
Bojko@carpenterlipps.com;
kboehm@BKLawfirm.com;
Kurt.Helfrich@ThompsonHine.com;
lhawrot@spilmanlaw.com;
mfleisher@elpc.org;
whitt@whitt-sturtevant.com;
msmckenzie@aep.com;
mpritchard@mwncmh.com;
MWarnock@bricker.com;
Michael.Austin@ThompsonHine.com;
mkurtz@BKLawfirm.com;
mnugent@igsenergy.com;
mjsettineri@vorys.com;
mdortch@kravitzllc.com;
mleppla@theoec.org;
glover@whitt-sturtevant.com;
rsahli@columbus.rr.com;
Rick.Sites@ohiohospitals.org;
rdove@attorneydove.com;
robert.eubanks@ohioattorneygeneral.gov;
rkelter@elpc.org;
Sarah.Parrot@puc.state.oh.us;
sasloan@aep.com;
ssheely@bricker.com;

Stephanie.Chmiel@ThompsonHine.com;
Stephen.Chriss@walmart.com;
stnourse@aep.com;
todonnell@dickinsonwright.com;
tony.mendoza@sierraclub.org;
tdougherty@theOEC.org;
wvorys@dicksonwright.com;
Werner.margard@ohioattorneygeneral.gov;
William.michael@occ.ohio.gov;
stnourse@aep.com
msmckenzie@aep.com
cmbblend@aep.com
egallon@porterwright.com
christopher.miller@icemiller.com
jeremy.grayem@icemiller.com

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in

Case No(s). 16-1852-EL-SSO, 16-1853-EL-AAM

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