

**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 ) Case No. 18-1604-EL-UNC  
Edison Company to Implement Matters )  
Relating to the Tax Cuts and Jobs Act of )  
2017. )

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo ) Case No. 18-1656-EL-ATA  
Edison Company for Approval of a Tariff )  
Change. )

In the Matter of the Application of Ohio )  
Edison Company, The Cleveland Electric )  
Illuminating Company, and The Toledo ) Case No. 17-2436-EL-UNC  
Edison Company Application for )  
Approval of a Distribution Platform )  
Modernization Plan. )

In the Matter of the Filing by Ohio Edison )  
Company, The Cleveland Electric )  
Illuminating Company, and The Toledo ) Case No. 16-0481-EL-UNC  
Edison Company of a Grid Modernization )  
Business Plan. )

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**MOTION REQUESTING PERMISSION FOR EVAN C. ZOLDAN TO APPEAR  
*PRO HAC VICE* BEFORE THE COMMISSION**

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Thomas R. Hays, admitted to the practice of law in Ohio, and pursuant to Ohio Adm. Code 4901-1-8(B), Ohio Adm. Code 4901-12, and Section 2(A) of Rule XII of the Supreme Court Rules for the Government of the Bar of Ohio, respectfully requests that the Public Utilities Commission of Ohio (“Commission”) grant Evan C. Zoldan (PHV-20794) permission to appear *pro hac vice* in this proceeding on behalf of NOAC and the NOAC Communities. The reasons that the Commission should grant Evan C. Zoldan

permission to appear *pro hac vice* are further set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Thomas R. Hays  
Thomas R. Hays  
Counsel of Record for NOAC and  
The NOAC Communities

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**MEMORANDUM IN SUPPORT**

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The Public Utilities Commission of Ohio (the “Commission”) is respectfully requested, pursuant to Rule XII of the Supreme Court Rules for the Government of the Bar of Ohio, to grant Evan C. Zoldan (PHV- 20794) permission to appear *pro hac vice* and participate as co-counsel on behalf of NOAC and the NOAC Communities in the above-captioned proceeding.

The following is a list of jurisdictions in which Evan C. Zoldan has been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

New York (Admitted 2004; Attorney Registration Number: 4241394; retired from practice of law)

Washington, DC (Admitted 2006, active and in good standing)

- i) Evan C. Zoldan 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 Rule XXII(2)(A)(6). Under that Rule, participation in a Commission proceeding – including a proceeding involving “the consolidation of two or more” Commission case numbers – counts as a single proceeding in the year the *pro hac vice* motion is granted. Gov. Bar Rule XII(2)(A)(6). In addition, any “appeal of [a Commission] order or ruling\*\*\*shall not be counted toward the annual limitation,” and if “a proceeding continues to the next or subsequent calendar years, the proceeding will not count toward the annual limitation.” *Id.*

Thomas R. Hays (0054062) an attorney licensed to practice in the State of Ohio in good standing, has agreed to associate with Evan C. Zoland in this proceeding.

Attached is a copy of the certificate of *pro hac vice* registration for Evan C. Zoldan furnished by the Supreme Court of Ohio Office of Attorney Services, a copy of

the affidavit required by Gov. Bar R. XII(2)(A)(6), and a certificate indicating service of this Motion on all known parties and attorneys of record in this proceeding.

Evan C. Zoldan understands that, if this Motion is granted, he must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Office of Attorney Services within thirty days of the Order.

WHEREFORE, the Commission is respectfully requested to grant permission for Evan C. Zoldan to appear *pro hac vice* before the Commission in this proceeding. Respectfully submitted,

/s/ Thomas R. Hays  
Thomas R. Hays  
Counsel of Record NOAC and  
The NOAC Communities

/s/ Evan Zoldan  
Evan C. Zoland  
413 5<sup>th</sup> Street  
Ann Arbor, MI 48103.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion was served on the persons stated below  
via electronic service, December 3, 2018.

/s/ Thomas R. Hays

Thomas R. Hays

## **SERVICE LIST**

[Thomas.lindgren@ohioattorneygeneral.gov](mailto:Thomas.lindgren@ohioattorneygeneral.gov)  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)  
[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)  
[gkrassen@bricker.com](mailto:gkrassen@bricker.com)  
[dstinson@bricker.com](mailto:dstinson@bricker.com)  
[mleppla@theOEC.org](mailto:mleppla@theOEC.org)  
[tdougherty@theOEC.org](mailto:tdougherty@theOEC.org)  
[jfinnigan@edf.org](mailto:jfinnigan@edf.org)  
[paul@carpenterlipps.com](mailto:paul@carpenterlipps.com)  
[Bojko@carpenterlipps.com](mailto:Bojko@carpenterlipps.com)  
[Dressel@carpenterlipps.com](mailto:Dressel@carpenterlipps.com)  
[ghiloni@carpenterlipps.com](mailto:ghiloni@carpenterlipps.com)  
[cmooney@ohiopartners.org](mailto:cmooney@ohiopartners.org)  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)  
[mwarnock@bricker.com](mailto:mwarnock@bricker.com)  
[dborchers@bricker.com](mailto:dborchers@bricker.com)  
[Bryce.McKenney@occ.ohio.gov](mailto:Bryce.McKenney@occ.ohio.gov)  
[Larry.Sauer@occ.ohio.gov](mailto:Larry.Sauer@occ.ohio.gov)

[jeckert@firstenergycorp.com](mailto:jeckert@firstenergycorp.com)  
[bknipe@firstenergycorp.com](mailto:bknipe@firstenergycorp.com)  
[jlang@calfee.com](mailto:jlang@calfee.com)  
[mkeaney@calfee.com](mailto:mkeaney@calfee.com)  
[fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)  
[mpritchard@mwncmh.com](mailto:mpritchard@mwncmh.com)  
[mfleisher@elpc.org](mailto:mfleisher@elpc.org)  
[rdove@keglerbrown.com](mailto:rdove@keglerbrown.com)  
[mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)  
[dborchers@bricker.com](mailto:dborchers@bricker.com)  
[dparram@bricker.com](mailto:dparram@bricker.com)  
[joliker@igsenergy.com](mailto:joliker@igsenergy.com)  
[mnugent@igsenergy.com](mailto:mnugent@igsenergy.com)  
[Bethany.Allen@igs.com](mailto:Bethany.Allen@igs.com)  
[whitt@whitt-sturtevant.com](mailto:whitt@whitt-sturtevant.com)  
[campbell@whitt-sturtevant.com](mailto:campbell@whitt-sturtevant.com)  
[glover@whitt-sturtevant.com](mailto:glover@whitt-sturtevant.com)

Attorney Examiners:

[Megan.addison@puc.state.oh.us](mailto:Megan.addison@puc.state.oh.us)  
[Gregory.price@puc.state.oh.us](mailto:Gregory.price@puc.state.oh.us)

# THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

**Evan Zoldan**

FOR PRO HAC VICE REGISTRATION

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

**Evan Zoldan**

Certificate of  
PRO HAC VICE  
REGISTRATION

2018

Registration Number:  
PHV- 20794-2018

\_\_\_\_\_, 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.



Gina White Palmer  
Director, Attorney Services

**Expires December 31, 2018**

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

**Commission of Ohio Docketing Information System on**

**12/5/2018 12:24:55 PM**

**in**

**Case No(s). 16-0481-EL-UNC, 17-2436-EL-UNC, 18-1604-EL-UNC, 18-1656-EL-ATA**

Summary: Motion Motion to admit Evan C. Zoldan Pro Hac Vice electronically filed by Mr. Thomas R. Hays on behalf of NOAC and City of Toledo and Lucas County Board of Commissioners and Lake Township Board of Trustees and City of Sylvania and Village of Ottawa Hills and City of Perrysburg and City of Northwood and City of Maumee and The Village of Holland and City of Oregon and Perrysburg Township and City of Rossford and Village of Walbridge and City of Waterville and Village of Delta