

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Filing by Ohio Edison )  
Company, The Cleveland Electric )  
Illuminating Company, and The Toledo ) Case No. 16-481-EL-UNC  
Edison Company of a Grid Modernization )  
Business Plan )

In the Matter of the Filing by 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 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 )

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**MOTION TO APPEAR PRO HAC VICE OF ROBERT KELTER**

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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: December 18, 2018

Respectfully submitted,

/s/ Robert Kelter  
Robert Kelter  
PHV-2685-2018  
Senior Attorney  
Environmental Law & Policy Center  
35 E. Wacker Drive, Suite 1600  
Chicago, IL 60601  
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# THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

## IN THE MATTER OF THE APPLICATION OF

Robert Kelter

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

## FOR PRO HAC VICE REGISTRATION

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 page if necessary):

Illinois (6236307)

District of Columbia (422887) (resigned)

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:

- 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*

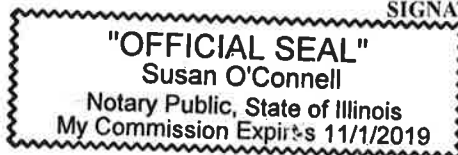
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 18<sup>th</sup> day of December,  
2018, in the state of Illinois and county of Cook.

*Susan O'Connell*

SIGNATURE OF NOTARY PUBLIC\*

\*Notary public's stamp/seal and commission expiration date are required.



# 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

2018

Registration Number:  
PHV- 2685-2018

\_\_\_\_\_, 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**

## 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 all Parties of Record, this 18<sup>th</sup> day of December, 2018.

/s Robert Kelter  
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PHV-2685-2018  
Senior Attorney  
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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/18/2018 4:44:20 PM**

**in**

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

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