

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Plan to Modernize Its Distribution Grid))	Case No. 18-1875-EL-GRD
))	
In the Matter of the Application of The Dayton Power and Light Company for Approval of a Limited Waiver of Ohio Adm. Code 4901:1-18-06(A)(2)))	Case No. 18-1876-EL-WVR
))	
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Methods))	Case No. 18-1877-EL-AAM

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).

Miranda Leppla, an active Ohio attorney in good standing (Bar No. 0086351), 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: August 29, 2019

Respectfully submitted,

/s/ Robert Kelter
Robert Kelter
PHV-2685-2019
Senior Attorney
Environmental Law & Policy Center
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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 29th day of August,

20 19, 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

2019

Registration Number:
PHV- 2685-2019

_____, 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, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Admission Pro Hac Vice was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on August 29, 2019. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Robert Kelter
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/29/2019 4:42:02 PM

in

Case No(s). 18-1875-EL-GRD, 18-1876-EL-WVR, 18-1877-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