

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of ) Case No. 23-23-EL-SSO  
Ohio Power Company for Authority to )  
Establish a Standard Service Offer )  
Pursuant to §4928.143, Ohio Rev. Code, )  
in the Form of an Electric Security Plan. )

In the Matter of the Application of ) Case No. 23-24-EL-AAM  
Ohio Power Company for Approval of )  
Certain Accounting Authority )

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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:

- Illinois, Bar No. 6236307, admission date: December 24, 1996
- California, Bar No. 139269, admission date: January 10, 1989 (inactive)
- District of Columbia, Bar No. 422887, admission date: February 23, 1990 (inactive as of October 31, 2000)

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).

Erica McConnell, an active Ohio attorney in good standing (Bar No. 102799), 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: February 8, 2023

Respectfully submitted,

/s/ Robert Kelter

Robert Kelter  
PHV-2685-2023  
Senior Attorney  
Environmental Law & Policy Center  
35 E. Wacker Drive, Suite 1600  
Chicago, IL 60601  
(312)-673-6500  
RKelter@elpc.org

IN THE MATTER OF THE MOTION OF

Robert Kelter

CASE NO. PUCO 23-23-EL-SSO et al.

FOR PERMISSION TO APPEAR PRO HAC VICE

Robert Kelter

AFFIDAVIT OF

OUT-OF-STATE ATTORNEY

Gov. Bar R. XII, Section 2(A)(7)

\_\_\_\_\_ 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:

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 7 day of February,

2023, in the state of Illinois and county of Cook.



\*Affix stamp & seal (required in Ohio).

[Signature]

SIGNATURE OF NOTARY PUBLIC\*

# 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

2023

Registration Number:  
PHV- 2685-2023

**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.



Gina White Palmer  
Director, Attorney Services

**Expires December 31, 2023**

## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Motion to Appear *pro hac vice* submitted on behalf of the Environmental Law & Policy Center was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on February 8, 2023. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Robert Kelter

Robert Kelter

PHV-2685-2022

Environmental Law & Policy Center

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*Counsel for the Environmental Law & Policy  
Center*

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**2/8/2023 2:26:05 PM**

**in**

**Case No(s). 23-0023-EL-SSO, 23-0024-EL-AAM**

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