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March 23, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Electric Division;
Docket No. R-2021-3023618

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Motion for Admission *Pro Hac Vice* of the Retail Energy Supply Association (“RESA”) and NRG Energy, Inc. (“NRG”) in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Sarah C. Stoner

Sarah C. Stoner

SCS/jls
Enclosure

cc: Honorable Steven K. Haas (sthaas@pa.gov) w/ enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via First Class Mail and/or Email

John M. Coogan, Esquire
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Date: March 23, 2021

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Sarah C. Stoner

Sarah C. Stoner, Esquire

Attorney for RESA and NRG Energy, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2021-3023618
v.	:	
	:	
UGI Utilities, Inc. – Electric Division	:	
	:	

NOTICE TO PLEAD

TO: Parties of Record

You are hereby notified that a responsive pleading to the enclosed **Motion for Admission *Pro Hac Vice* of RESA and NRG Energy, Inc.** must be filed within 20 days of the date of service. All responsive pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for RESA and NRG Energy, Inc. and the Administrative Law Judge assigned this matter.

File with:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Sarah C. Stoner, Esquire
Attorney ID No.: 313793
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101
sstoner@eckertseamans.com

Due to the COVID-19 pandemic, the Pennsylvania Public Utility Commission is encouraging individuals to eFile documents. Information regarding eFiling with the Commission is available at <https://www.puc.pa.gov/filing-resources/efiling/>.

Sarah C. Stoner

Date: March 23, 2021

Sarah C. Stoner, Esquire
Attorney for RESA
and NRG Energy, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2021-3023618
v.	:	
	:	
UGI Utilities, Inc. – Electric Division	:	
	:	

**RESA AND NRG ENERGY, INC.’S MOTION
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22, Pa. B.A.R. 301(a) and Pa. R.C.P. 1012.1(d)(1) Sarah C. Stoner, of Eckert Seamans Cherin & Mellott, LLC moves for the admission *pro hac vice* of Cody T. Murphey, Esquire to appear on behalf of the Retail Energy Supply Association (“RESA”) and NRG Energy, Inc. (“NRG”) in this proceeding.

1. In support of this Motion, a Verified Statement of Sarah C. Stoner, Esquire is attached hereto as Exhibit A and a Verified Statement of Cody T. Murphey, Esquire is attached hereto as Exhibit B.

2. The candidate is a member of good standing of the jurisdiction listed in Exhibit B and he has never been suspended, disbarred or otherwise disciplined by any court or administrative body.

3. Mr. Cody T. Murphey is specifically qualified to participate in this action as he is an Associate Attorney at Eckert Seamans Cherin & Mellott, LLC and has extensive public utility law experience.

4. *Pro hac vice* appearance before the Pennsylvania Public Utility Commission is the equivalent to appearance before a special court, and no fee paid to the Pennsylvania Interest on

Lawyers' Trust Accounts Board ("IOLTA Board") is therefore required for Mr. Murphey to appear *pro hac vice* before the Commission.¹

5. RESA and NRG have requested that Mr. Cody T. Murphey be admitted to represent RESA and NRG in this proceeding.

WHEREFORE, the undersigned respectfully move that Cody T. Murphey, Esquire be admitted to appear *pro hac vice* on behalf of RESA and NRG in this proceeding.

Respectfully submitted,

Sarah C. Stoner

Deanne M. O'Dell, Esq.
Attorney ID No.: 81064
Sarah C. Stoner, Esq.
Attorney I.D. No.: 313793
Eckert Seamans Cherin & Mellott, LLC
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Date: March 23, 2021

Counsel for RESA and NRG Energy, Inc.

¹ 204 Pa. Code §§ 81.505(c).

Exhibit A
Verification of Sarah C. Stoner, Esquire

I, the undersigned, do hereby certify and state under penalty of perjury and subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney with the law firm of Eckert Seamans Cherin & Mellott, LLC, my office is located in Harrisburg, Pennsylvania, and I am a resident of Pennsylvania.
2. I currently represent RESA and NRG in this matter and will continue to serve as the attorney of record for this proceeding.
3. I am a member in good standing of the Commonwealth of Pennsylvania (bar number 313793).
4. After reasonable investigation, I reasonably believe that Mr. Cody T. Murphey is a reputable and competent attorney and I recommend his admission *pro hac vice*.
5. Currently, I am not sponsoring any other attorney admitted *pro hac vice* in a Pennsylvania proceeding.
6. Any proceeds from any settlement in this matter shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

Respectfully submitted,

Sarah C. Stoner

Sarah C. Stoner, Esquire
Attorney ID No.: 313793
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sstoner@eckertseamans.com

Date: March 23, 2021

Exhibit B
Verification of Cody T. Murphey, Esquire

I, the undersigned, do hereby certify and state under penalty of perjury and subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney who is not currently admitted to the bar of the Commonwealth of Pennsylvania and am seeking permission to appear *pro hac vice* before the Pennsylvania Public Utility Commission on behalf of RESA and NRG in this matter.

2. I am admitted to practice in the Commonwealth of Virginia (bar number 89437) and am a member in good standing.

3. I am not nor have I ever been suspended, disbarred, or otherwise disciplined in any court or administrative body. I am not, nor have I ever been subject to any disciplinary proceedings.

4. I have never been denied *pro hac vice* admission in any proceeding.

5. I am currently an Associate Attorney at Eckert Seamans Cherin & Mellott, LLC, and in that role I represent public utilities, electric cooperatives, and licensed electric generation suppliers before the Virginia State Corporation Commission, Federal Energy Regulatory Commission, and the Federal Communications Commission. Prior to starting at Eckert Seamans, I was an Assistant Attorney General at the Virginia Office of the Attorney General's Division of Consumer Counsel where I represented Virginia ratepayers before the Virginia State Corporation Commission and Federal Energy Regulatory Commission.

6. If granted *pro hac vice* admission, I will comply with and be bound by the applicable statutes, case law and procedural rules of the Pennsylvania Public Utility Commission and, as applicable, the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

7. If granted *pro hac vice* admission, I agree to submit to the jurisdiction of the Pennsylvania Public Utility Commission and, to the extent applicable, the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my *pro hac vice* admission.

8. I consent to the appointment of Sarah C. Stoner of the law firm of Eckert Seamans Cherin & Mellott, LLC as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in this matter for which *pro hac vice* admission is sought.

Respectfully submitted,



Date: March 23, 2021

Cody T. Murphey, Esq.
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