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February 6, 2015

VIA E-FILING AND FIRST CLASS MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Commonwealth of Pennsylvania, et al. v. Blue Pilot Energy, LLC
Docket No. C-2014-2427655

Dear Secretary Chiavetta:

On behalf of Blue Pilot Energy, LLC, I have enclosed for electronic filing the Motion for Admission of Travis G. Cushman *Pro Hac Vice* in the above-captioned matter.

Copies have been served on all parties as indicated in the attached certificate of service.

Very truly yours,



Karen O. Moury

KOM/bb
Enclosure
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|--------------------------------|---|----------------------------------|
| COMMONWEALTH OF | : | |
| PENNSYLVANIA, ET AL., | : | |
| | : | |
| Complainants, | : | |
| | : | |
| v. | : | Docket No. C-2014-2427655 |
| | : | |
| BLUE PILOT ENERGY, LLC, | : | |
| | : | |
| Respondent. | : | |

**MOTION FOR ADMISSION OF TRAVIS G. CUSHMAN
PRO HAC VICE ON BEHALF OF BLUE PILOT ENERGY, LLC**

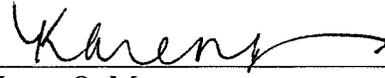
To the Honorable Elizabeth H. Barnes and the Honorable Joel Cheskis:

Pursuant to 52 Pa. Code § 1.22(b), Pa. Bar Adm. R. 301, 204 Pa. Code § 301, and Pa. R. Civ. P. 1021.1, the undersigned, an attorney admitted to the bar of the Commonwealth of Pennsylvania in good standing, hereby moves on behalf of Blue Pilot Energy, LLC. for the admission *pro hac vice* of Travis G. Cushman, Kelley Drye & Warren LLP, member of the bar of Oklahoma (Attorney I.D. #30368), Virginia (Attorney I.D. #79568), and New York (Attorney I.D. #788415) to appear *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC. The verified statements of Travis G. Cushman and Karen O. Moury are attached hereto as Exhibits A and B and are submitted in support of this motion.

Wherefore, for the reasons set forth above and in the Verified Statements attached hereto, the undersigned and Blue Pilot Energy, LLC respectfully request that this motion be granted.

Respectfully submitted,

Dated: February 6, 2015



Karen O. Moury
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409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
(717) 237-4820

Attorneys for Blue Pilot Energy, LLC

EXHIBIT A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | |
|--------------------------------|------------------------------------|
| COMMONWEALTH OF | : |
| PENNSYLVANIA, ET AL., | : |
| | : |
| Complainants, | : |
| | : |
| v. | : Docket No. C-2014-2427655 |
| | : |
| BLUE PILOT ENERGY, LLC, | : |
| | : |
| Respondent. | : |

VERIFICATION OF TRAVIS G. CUSHMAN

I, Travis G. Cushman, state as follows in support of the motion for my admission *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC:

1. I am currently a member of the bar of the Oklahoma (Attorney I.D. #30368), Virginia (Attorney I.D. #79568), and New York (Attorney I.D. #788415). I am not and have never been suspended, disbarred or otherwise disciplined by any jurisdiction, nor am I subject to disciplinary proceedings in any jurisdiction.

2. I have not applied for admission *pro hac vice* in any other Pennsylvania forum. I shall comply with and be bound by the applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

3. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance *pro hac vice* in this matter.

4. I consent to the appointment of Karen O. Moury as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of my practice of law in this matter.

I hereby verify that the foregoing is true and correct, subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities.)

Dated: February 5, 2015


Travis G. Cushman, OK Atty. I.D. #30368
KELLEY DRYE & WARREN LLP
Washington Harbour, Suite 400
3050 K Street, NW, Washington, DC 20007
Telephone: (202) 342-8573
Facsimile: (202) 342-8451

EXHIBIT B

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|--------------------------------|---|----------------------------------|
| COMMONWEALTH OF | : | |
| PENNSYLVANIA, ET AL., | : | |
| | : | |
| Complainants, | : | |
| | : | |
| v. | : | Docket No. C-2014-2427655 |
| | : | |
| BLUE PILOT ENERGY, LLC, | : | |
| | : | |
| Respondent. | : | |

VERIFICATION OF KAREN O. MOURY

I, Karen O. Moury, state as follows in support of the motion for my admission of Travis G. Cushman *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC:

1. I have entered an appearance as attorney of record in the above-captioned matter on behalf of Blue Pilot Energy, LLC.

2. After reasonable investigation, I believe Travis G. Cushman to be a reputable and competent attorney, and I am in a position to recommend his admission to appear *pro hac vice* on behalf of Blue Pilot Energy, LLC.

3. I am currently sponsoring Mark R. Robeck, Daniel S. Blynn, Catherine M. Wilmarth, and Geoffrey W. Castello in the above-captioned proceeding pending before the Pennsylvania Public Utility Commission (“Commission”). I am not currently acting as a sponsor of any other candidate in any court of record of the Commonwealth of Pennsylvania or before the Commission.

4. No settlement proceeds from this action are anticipated; however, any such proceeds shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Conduct, including the IOLTA provisions thereof, if applicable.

I hereby verify that the foregoing is true and correct, subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities.)

Dated: February 6, 2015



Karen O. Moury
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(717) 237-4820

Attorneys for Blue Pilot Energy, LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**COMMONWEALTH OF
PENNSYLVANIA, ET AL.**

v.

BLUE PILOT ENERGY, LLC

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Docket Nos. C-2014-2427655

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via Email and First Class Mail

Elizabeth Barnes
Joel Cheskis
Administrative Law Judges
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Harrisburg, PA 17101

Michael L. Swindler
Wayne T. Scott
Stephanie Wimer
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
PO Box 3265
Harrisburg, PA 17105-3265

Barbara R. Alexander
83 Wedgewood Drive
Winthrop, Maine 04364

Dated this 6th day of February, 2015.



Karen O. Moury, Esq.