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Anthony D. Kanagy

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May 19, 2017

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor North P.O. Box 3265 Harrisburg, PA 17105-3265

Re: Application of Transource Pennsylvania, LLC for All of the Necessary Authority, Approvals, and Certificates of Public Convenience (1) to Begin to Furnish and Supply Electric Transmission Service in Franklin and York Counties, Pennsylvania; (2) for Certain Affiliated Interest Agreements; and (3) for any Other Approvals Necessary to Complete the Contemplated Transactions

Docket No. A-2017-2587821

Dear Secretary Chiavetta:

Enclosed please find the Motion of Transource Pennsylvania, LLC for Admission *Pro Hac Vice* for Hector Garcia, Esquire, for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Anthony D. Kanagy

ADK/skr Enclosure

cc: Certificate of Service

Honorable Elizabeth Barnes

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

Darryl A. Lawrence, Esquire Kristine E. Marsilio, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

Tori Giesler, Esquire Teresa K. Schmittberger, Esquire FirstEnergy Service Company 2800 Pottsville Pike P.O. Box 16001 Reading, PA 19612-6001 Counsel for Mid-Atlantic Interstate Transmission, LLC Romulo L. Diaz, Jr., Esquire Jack R. Garfinkle, Esquire Michael S. Swerling, Esquire Jennedy S. Johnson, Esquire PECO Energy Company 2301 Market Street Philadelphia, PA 19103 Counsel for PECO Energy

Date: May 19, 2017

Anthony D. Kanagy

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania,

LLC for a Certificate of Public

Convenience to Begin to Furnish and

Anthony D. Kanagy, avers as follows:

Supply Electric Transmission Service in

Franklin and York Counties, Pennsylvania

Docket Nos. A-2017-2587821

G-2017-2587822

MOTION OF TRANSOURCE PENNSYLVANIA, LLC FOR ADMISSION PRO HAC VICE

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission's ("Commission") regulations, 52 Pa. Code § 5.103, and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for Transource Pennsylvania, LLC ("Transource PA" or the "Company"), Anthony D. Kanagy, Esq., respectfully requests that Your Honor enter an Order granting admission *pro hac vice* to Hector Garcia, Esq., as counsel for Transource PA for all purposes in relation to these proceedings ("Motion"). In support thereof, the Movant,

1. Pursuant to Section 1.24(b)(1) of the Commission's regulations, 52 Pa. Code § 1.24(b)(1), the Movant has entered his appearance as counsel of record for Transource PA in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), and is a Principal with Post & Schell, P.C., whose principal office is in Philadelphia, Pennsylvania.

- 2. Hector Garcia is a Senior Counsel with American Electric Power Service Corporation, 1 Riverside Plaza, 29th Floor, Columbus, Ohio 43215.
- 3. Hector Garcia is a 2002 graduate of The George Washington University Law School. He has been a member in good standing of the Bar of Virginia since 2002, the Bar of the District of Columbia since 2003, and the Bar of Ohio since 2014.
- 4. Hector Garcia has experience and particular expertise in various aspects of regulatory and energy law, including issues related to electric transmission service, and has appeared in numerous proceedings before the Federal Energy Regulatory Commission and state utility commissions. Mr. Garcia has represented American Electric Power and its affiliates in energy regulatory matters for more than 8 years and has extensive knowledge of their operations, service activities, and regulatory history.
- 5. Wherefore, Anthony D. Kanagy, Movant and Counsel of Record for Transource PA, respectfully moves for admission of Hector Garcia, *pro hac vice*, on behalf of Transource PA for all permissible purposes in relation to these proceedings.

Respectfully submitted,

Amanda Riggs Conner (District of Columbia ID # 481740)

Hector Garcia (VA ID # 48304)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, OH 43215 Phone: 614-716-3410 Fax: 614-716-1613

Date: May 19, 2017

E-mail: arconner@aep.com E-mail: hgarcial@aep.com David B. MacGregor (PA ID # 28804) Anthony D Kanagy (PA ID # 85522) Christopher T. Wright (PA ID # 203412)

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Counsel for Transource Pennsylvania, LLC

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania,

LLC for a Certificate of Public Convenience

to Begin to Furnish and Supply Electric Transmission Service in Franklin and York

Counties, Pennsylvania

Docket Nos. A-2017-2587821

G-2017-2587822

VERIFIED STATEMENT OF ANTHONY D. KANAGY, SPONSOR OF HECTOR GARCIA, FOR ADMISSION PRO HAC VICE

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Anthony D. Kanagy, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), is moving for the admission pro hac vice of Hector Garcia, Esq. in the abovecaptioned proceeding. In support of the Motion, I, the sponsor, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

- 1. I have had sufficient opportunity to conduct a reasonable investigation regarding Mr. Garcia and can state that he is a reputable and competent attorney.
- 2. Any proceeds from the settlement of a cause of action in which the candidate is granted admission pro hac vice 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.
- 3. I shall remain the attorney of record in this case, as required by the Rules of Civil Procedure.
- 4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were

held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,

Anthony D Kanagy (PA ID # 85522)

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Date: May 19, 2017 E-mail: akanagy@postschell.com

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Transource Pennsylvania,

LLC for a Certificate of Public Convenience

to Begin to Furnish and Supply Electric

Transmission Service in Franklin and York

Counties, Pennsylvania

Docket Nos. A-2017-2587821

G-2017-2587822

VERIFIED STATEMENT OF HECTOR GARCIA FOR ADMISSION PRO HAC VICE

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Anthony D. Kanagy, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 85522), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of the said sponsor's Motion, I, the candidate, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

- 1. I am admitted to practice in and am a member of good standing in the Bar of Virginia, having been admitted in 2002; in the Bar of the District of Columbia, 2003; and the Bar of Ohio, 2014. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.
- 2. 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 in the matter for which admission *pro hac vice* is being sought.

4. I consent to the appointment of the sponsoring attorney, Anthony D. Kanagy, Esq., 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 the matter for which admission *pro hac vice* is sought.

5. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,

Hector Garcia (VA ID # 48304)

American Electric Power Service Corporation

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Fax: 614-716-1613

May 18, 2017

Date:

E-mail: hgarcia1@aep.com