

100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166 Tel: 717.232.8000 • Fax: 717.237.5300 Kenneth R. Stark Direct Dial: 717.237.5378 Fax: 717.237.5300 kstark@mcneeslaw.com

September 18, 2020

VIA ELECTRONIC FILING

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

RE: Application of Duquesne Light Company filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 138 kV Transmission Lines Associated with the Brunot Island - Crescent Project in the City of Pittsburg, McKees Rocks Borough, Kennedy Township, Robinson Township, Moon Township, and Crescent Township, Allegheny County, Pennsylvania Docket No. A-2019-3008589

Application of Duquesne Light Company under 15 Pa. C.S. § 1511(c) for a Finding and Determination That the Service to be Furnished by the Applicant through Its Proposed Exercise of the Power of Eminent Domain to Acquire a Certain Portion of the Lands of George N. Schaefer of Moon Township, Allegheny County, Pennsylvania for the Siting and Construction of Transmission Lines Associated with the Proposed Brunot Island - Crescent Project Is Necessary or Proper for the Service, Accommodation, Convenience, or Safety of the Public. Docket No. A-2019-3008652

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Pro Hac Vice of the Allegheny County Sanitation Authority, in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the

Rosemary Chiavetta, Secretary September 18, 2020 Page 2

current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By Nerneth R. Stark
Kenneth R. Stark

KRS/ams Enclosure

c: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL

Anthony D. Kanagy, Esquire Garrett P Lent, Esquire Post & Schell PC 17 North Second Street 12th Floor Harrisburg, PA 17101-1601

Accepts E-Service

Representing Duquesne Light Company

Emily Farah, Esquire Tishekia Williams, Esquire DuQuesne Light Company 411 Seventh Ave., 15th Floor Pittsburgh, PA 15219

Accepts E-Service

John P. Crowe Jennifer A. Crowe 1123 Juanita Drive Coraopolis, PA 15108 jacrowe4@gmail.com

Via e-mail only due to Emergency Order at M-2020-3019262

Victoria Adams 306 Konter Rd Coraopolis, PA 15108 adamsvic@gmail.com Via e-mail only due to Emergency Order at M-2020-3019262

Dennis J Zona Jeanne M Zona 108 Wynview Dr Coraopolis, PA 15108 dzona108@verizon.net Via e-mail only due to Emergency Order at M-2020-3019262

Joe Rabosky Suzanne Rabosky 104 Wynview Dr Coraopolis, PA 15108 josuz69@comcast.com Via e-mail only due to Emergency Order at M-2020-3019262

Zachariah Nave 7 McGovern Blvd Crescent, PA 15046 zaknave@yahoo.com Via e-mail only due to Emergency Order at M-2020-3019262

Folezia Marinkovic 205 Purdy Rd Crescent, PA 15046 fmarinkovic@comcast.net Via e-mail only due to Emergency Order at M-2020-3019262

Aaron Siegel 110 Wynview Dr Coraopolis, PA 15108 **Accepts E-Service**

Cynthia Wilson Patrick Wilson 9 McGovern Blvd Crescent, PA 15046 chamberlinsc@comcast.net Via e-mail only due to Emergency Order at M-2020-3019262

VIA U.S. Mail

Joanne Rushman 102 Westbury Dr Moon Township, PA 15108 Doug Meyer Linda Meyer 111 Wynview Dr Moon Twp., PA 15108-1032

Richard I. Gable 126 Flaugherty Run Rd Coraopolis, PA 15108

Idennetto R. Stark

Kenneth R. Stark

Counsel to Allegheny County Sanitation Authority

Dated this 18th day of September, 2020, in Harrisburg, Pennsylvania

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Duquesne Light Company filed : A-2019-3008589

Pursuant to 52 Pa. Code Chapter 57,

Subchapter G, for Approval of the Siting and

Construction of the 138 kV Transmission :

Lines Associated with the

Brunot Island - Crescent Project in

the City of Pittsburgh, McKees Rocks Borough,

Kennedy Township, Robinson Township,

Moon Township, and Crescent Township,

Allegheny County, Pennsylvania.

Application of Duquesne Light Company : A-2019-3008652

under 15 Pa.C.S. § 1511(c) for a Finding and

Determination That the Service to be Furnished by the Applicant through Its Proposed Exercise

of the Descent of Engineer Description

of the Power of Eminent Domain to

Acquire a Certain Portion of the Lands of George N. Schaefer of Moon Township,

Allegheny County, Pennsylvania for the

Siting and Construction of Transmission Lines

Associated with the Proposed

Brunot Island - Crescent Project Is Necessary

or Proper for the Service, Accommodation, :

Convenience, or Safety of the Public. :

MOTION FOR ADMISSION PRO HAC VICE OF OLUWATOSIN A. ADENIYI

Kenneth R. Stark, on behalf of the Allegheny County Sanitary Authority, Pennsylvania, hereby moves for the admission *pro hac vice* of Oluwatosin A. (Ade) Adeniyi to appear and participate on ALCOSAN's behalf in this proceeding.

1. Mr. Stark is a member in good standing in the Bar of the Supreme Court of Pennsylvania holding Bar I.D. No. 312945.

2. Oluwatosin A. Adeniyi is a member of the State Bar of New York, license No.

4753653 and a member of the State Bar of Georgia, license No. 501314. Her business address

is:

McNees Wallace and Nurick LLC

100 Pine Street,

Harrisburg, PA 17101

Telephone: 717.232.8000

Facsimile: 717.237.5300

aadeniyi@mcneeslaw.com

3. Ms. Adeniyi is not now, nor has she ever been, under any order of discipline by

any disciplinary board and is a member in good standing of the State Bar of New York and of the

State Bar of Georgia.

4. Ms. Adeniyi is of good moral and professional character and, if requested, will

swear and affirm herself as an attorney and counselor of this Court, uprightly and according to

law, and that she will support the Constitution of the United States.

5. Ms. Adeniyi has not previously been admitted to the courts of Pennsylvania but

will seek admission to Pennsylvania on reciprocity with the State of New York.

6. After reasonable investigation, I believe Ms. Adeniyi to be a reputable and

competent attorney, and I am in a position to recommend her admission. Prior to joining

McNees Wallace & Nurick, LLC, Ms. Adeniyi worked as a Staff Attorney at the Georgia Public

Service Commission. Accordingly, Ms. Adeniyi has requisite experience in public utility law.

7. I am acting as the sponsor of a candidate for admission pro hac vice in this

proceeding.

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WHEREFORE, it is respectfully requested that Oluwatosin A. Adeniyi be admitted *pro hac vice* in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

Idennetto R. Stark

By.

Kenneth R. Stark (Pa. I.D. No. 312945)

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Counsel to Allegheny County Sanitary Authority

Dated: September 18, 2020