

# O'BRIEN, BELLAND & BUSHINSKY, LLC

ATTORNEYS AT LAW

MARK E. BELLAND (NJ & PA)  
STEVEN J. BUSHINSKY (NJ, NY & PA)  
THOMAS F. KARPOUSIS (NJ)  
KEVIN D. JARVIS (NJ & NY)  
TIMOTHY P. HAGGERTY (NJ)  
DAVID F. WATKINS, JR. (NJ & PA)  
MATTHEW B. MADSEN (NJ & NY)  
DAVID H. LIPOW (NJ & PA)  
DANIEL A. HOROWITZ\* (NJ & PA)  
ROSINA M. ERMILIO (PA)  
RYAN T. GEIB (NJ & PA)  
DANIEL H. MARIANI (NJ)

509 S. LENOLA ROAD  
BUILDING 6  
MOORESTOWN, NEW JERSEY 08057

(856) 795-2181  
(888) 609-8300  
FAX (856) 581-4214  
INTERNET: WWW.OBBBLAW.COM  
E-MAIL: OBBB@OBBBLAW.COM

ROBERT F. O'BRIEN (NJ, PA & DC)  
1942-2023

JOAN FREEDMAN MEYER (NJ & PA)  
1931-2011

OF COUNSEL  
CARL J. MINSTER III (PA & NJ)  
DAVID J. J. FACCILOLO (DE & PA)  
DAVID R. THIERMAN\* (NJ, PA & FL)

\* MASTERS OF LAW IN TAXATION

May 15, 2024

## VIA ELECTRONIC FILING

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

**RE: Pennsylvania Public Utility Commission v. FirstEnergy Pennsylvania Electric  
Company  
Docket No. R-2024-3047068  
Internal File No. 1577-002**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced proceeding, please find the Motion for Admission *Pro Hac Vice* of Nicholas J. Enoch. All parties are asked to include Mr. Enoch on their e-service list, at [nick@lubinandenoch.com](mailto:nick@lubinandenoch.com). As evidenced by the attached Certificate of Service, all parties to this proceeding are being served with a copy of this document. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,

Mark E. Belland, Esq.  
Pa. I.D. No. 41728  
O'BRIEN, BELLAND & BUSHINSKY, LLC  
509 South Lenola Road, Building 6  
Moorestown, New Jersey 08057  
Phone: (856) 795-2181  
Fax: (856) 581-4214  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)  
*Sponsoring Attorney*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

FirstEnergy Pennsylvania Electric Company

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Docket No. R-2024-3047068

**MOTION FOR ADMISSION *PRO HAC VICE***

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Mark E. Belland  
O'BRIEN, BELLAND & BUSHINSKY, LLC  
509 South Lenola Road, Building 6  
Moorestown, New Jersey 08057  
Phone: (856) 795-2181  
Fax: (856) 581-4214  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)

Nicholas J. Enoch, *pro hac vice application*  
LUBIN & ENOCH, P.C.  
349 North 4<sup>th</sup> Avenue  
Phoenix, Arizona 85003-1505  
Phone: (602) 234-0008  
Fax: (602) 626-3586  
[nick@lubinandenoch.com](mailto:nick@lubinandenoch.com)

*Counsel for Intervenor IBEW Local 777*

**May 15, 2024**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

FirstEnergy Pennsylvania Electric Company

Docket No. R-2024-3047068

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and Pa. R.C.P. No. 1012.1, Mark E. Belland Esq. (“Sponsor”) moves for the admission *pro hac vice* of Nicholas J. Enoch, Esq. (the “Candidate”) to appear on behalf of Local 777 of the International Brotherhood of Electrical Workers, AFL-CIO (“IBEW Local 777”) in the above-captioned proceeding of the Pennsylvania Public Utility Commission (the “Commission”).

1. Pursuant to 231 Pa. Code. § 1012.1(b)(2), a Verified Statement of Mark E. Belland, Esq. is attached hereto as **Exhibit A**; a Verified Statement of Nicholas J. Enoch, Esq. is attached hereto as **Exhibit B**.

2. Sponsor is a member in good standing of the bar of the Commonwealth of Pennsylvania and has never been suspended, disbarred, or otherwise disciplined by a court or administrative body. Sponsor has entered an appearance in the above-captioned proceeding on behalf of IBEW Local 777 and shall remain attorney of record.

3. Nicholas J. Enoch, Esq. is a member in good standing of the bars of Arizona, Colorado, and Texas, and has never been suspended, disbarred, or otherwise disciplined by any court or administrative body.

4. *Pro hac vice* appearance before the Commission is the equivalent of appearance before a special court as defined in 204 Pa. Code § 81.501(g). As such, the Candidate's appearances in this proceeding *pro hac vice* does not require the payment of any fee to the Pennsylvania Interest on Lawyers' Trust Accounts Board ("IOLTA Board") under 204 Pa. Code § 81.505(c) or the filing of an informational form with the IOLTA Board under 204 Pa. Code § 81.503(c) and 204 Pa. Code § 81.504. 5.

5. The Candidate has experience in matters relating to ratemaking by public utilities, and IBEW Local 777 has requested that the Candidate be admitted to represent it in this proceeding.

WHEREFORE, the undersigned Sponsor respectfully moves that the Candidate be admitted to appear *pro hac vice* on behalf of IBEW Local 777 in this proceeding.

RESPECTFULLY SUBMITTED this 15th day of May, 2024.

O'BRIEN, BELLAND & BUSHINSKY, LLC  
LUBIN & ENOCH, P.C.

By: /s/ Mark E. Belland, Esq.  
Mark E. Belland (Pa. I.D. No. 41728)  
509 South Lenola Road, Building 6  
Moorestown, New Jersey 08057  
Phone: (856) 795-2181  
Fax: (856) 581-4214  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)

Nicholas J. Enoch (Arizona State Bar No. 16473)  
349 North 4<sup>th</sup> Avenue  
Phoenix, Arizona 85003-1505  
Phone: (602) 234-0008  
Fax: (602) 626-3586  
[nick@lubinandenoach.com](mailto:nick@lubinandenoach.com)

*Counsel to Intervenor IBEW Local 777*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding, via email, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

The Honorable Katrina L. Dunderdale  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Suite 220 Piatt Place  
301 Fifth Avenue  
Pittsburgh, PA 15222  
[kdunderdal@pa.gov](mailto:kdunderdal@pa.gov)

C Annette Martin  
3350 White Church Road  
Chambersburg, PA 17105-3265  
[g15a20@yahoo.com](mailto:g15a20@yahoo.com)

Tori L. Giesler, Esq.  
Darshana Singh, Esq.  
Angelina M. Umstead, Esq.  
FirstEnergy Service Company  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)  
[singhd@firstenergycorp.com](mailto:singhd@firstenergycorp.com)  
[aumstead@firstenergycorp.com](mailto:aumstead@firstenergycorp.com)

David B. MacGregor, Esq.  
Garrett P. Lent, Esq.  
Nicholas A. Stobbe, Esq.  
Devin T. Ryan, Esq.  
[dmacgregor@postschell.com](mailto:dmacgregor@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
[nstobbe@postschell.com](mailto:nstobbe@postschell.com)  
[dryan@postschell.com](mailto:dryan@postschell.com)  
Attorneys for FE PA

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Devin T. Ryan, Esq.  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
[dryan@postschell.com](mailto:dryan@postschell.com)

Scott B. Granger, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265 Harrisburg, PA 17105-3265  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Darryl A. Lawrence, Esq.  
Harrison Breitman, Esq.  
Andrew J. Zerby, Esq.  
Emily A. Farren, Esq.  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[azerby@paoca.org](mailto:azerby@paoca.org)  
[EFarren@paoca.org](mailto:EFarren@paoca.org)  
[OCAFirstEnergy2024@paoca.org](mailto:OCAFirstEnergy2024@paoca.org)

NazAarah Sabree  
Small Business Advocate  
[ra-sba@pa.gov](mailto:ra-sba@pa.gov)  
Office of Small Business Advocate

Rebecca Lyttle, Esq.  
Sharon E. Webb, Esq.  
Assistant Small Business Advocate  
[relyttle@pa.gov](mailto:relyttle@pa.gov)  
[swebb@pa.gov](mailto:swebb@pa.gov)

///

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Harrison W. Breitman, Esq.  
Emily A. Farren, Esq.  
[Hbreitman@paoca.org](mailto:Hbreitman@paoca.org)  
[Efarren@paoca.org](mailto:Efarren@paoca.org)  
Assistant Consumer Advocates

Ria M. Pereira, Esq.  
Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Lauren N. Berman, Esq.  
[pulp@paulitylawproject.org](mailto:pulp@paulitylawproject.org)  
Attorneys for Intervenor-Applicant CAUSE-PA

Brian T. Kadlubek, Esq.  
[btkadlubek@lawgol.com](mailto:btkadlubek@lawgol.com)  
Attorney for Intervenor-Applicant IBEW Local 459

Susan E. Bruce, Esq.  
Charis Mincavage, Esq.  
Kenneth R. Stark, Esq.  
Harrison Ryan Block, Esq.  
Mcnees Wallace & Nurick LLC  
100 pine street  
PO Box 1166  
Harrisburg, PA 17101  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[kstark@mcneeslaw.com](mailto:kstark@mcneeslaw.com)  
[rblock@mcneeslaw.com](mailto:rblock@mcneeslaw.com)

Mark E. Belland, Esq.  
509 South Lenola Road, Building 6  
Moorestown, New Jersey 08057  
[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)

/s/ Jennifer Ingram

**EXHIBIT A**

VERIFIED STATEMENT OF MARK E. BELLAND, ESQ.



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

FirstEnergy Pennsylvania Electric Company

Docket No. R-2024-3047068

**VERIFIED STATEMENT OF MARK E. BELLAND, ESQ.**

I, Mark E. Belland, hereby state as follows:

1. I am an attorney at O'Brien, Belland & Bushinsky, LLC in the Commonwealth of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania (Pa. I.D. No. 41728) and am in good standing with all courts and administrative agencies of the Commonwealth.
3. I have never been suspended, disbarred, or disciplined by a court or administrative agency, nor am I subject to any proceeding for suspension, disbarment, or disciplinary action.
4. I am currently acting as sponsor for one (1) candidate for admission *pro hac vice* in the above-captioned proceeding of the Commission. Otherwise, I am not currently acting as a sponsor in any other cases in any court of record in the Commonwealth.
5. After reasonable investigation, I believe Nicholas J. Enoch, Esq. to be a reputable and competent attorney.
6. I am in a position to recommend the admission *pro hac vice* of Nicholas J. Enoch, Esq.
7. If there should be any proceeds from the settlement of this proceeding, such proceeds 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, if applicable.

8. The foregoing statements are true to the best of my knowledge, information, and belief. I understand that the statements herein made are subject to penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Dated: May 15, 2024.

Respectfully submitted,

/s/ Mark E. Belland, Esq.

Mark E. Belland (Pa. I.D. No. 41728)

509 South Lenola Road, Building 6

Moorestown, New Jersey 08057

Phone: (856) 795-2181

Fax: (856) 581-4214

[mbelland@obbblaw.com](mailto:mbelland@obbblaw.com)

*Counsel for Intervenor IBEW Local 777*

**EXHIBIT B**

VERIFIED STATEMENT OF NICHOLAS J. ENOCH, ESQ.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

FirstEnergy Pennsylvania Electric Company

Docket No. R-2024-3047068

**VERIFIED STATEMENT OF NICHOLAS J. ENOCH, ESQ.**

Pursuant to 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and 231 Pa. Code 1012.1(c), Mark E. Belland, Esq. (“Sponsor”), a member of the bar of the Commonwealth of Pennsylvania (PA I.D. No. 41728), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of Sponsor’s motion, I, Nicholas J. Enoch, state as follows:

1. I am the president of Lubin & Enoch, P.C., a private law firm.
2. I am admitted to practice in the courts of Arizona (State Bar No. 016473), Colorado (State Bar No. 27113), and Texas (State Bar No. 24042618). I am in good standing in these jurisdictions. I have never been suspended, disbarred, disciplined, or otherwise subject to any disciplinary proceeding in any jurisdiction.
3. Since 2000, I have represented various labor organizations - mostly IBEW local unions - in rate setting, and various other public utility regulatory, proceedings in Arizona, Colorado, Delaware, Maryland, Texas and before the Federal Energy Regulatory Commission. And in November 2009, I taught a continuing legal education class at the IBEW Lawyers’ Conference on “Representing IBEW Locals Before State Public Utility Commissions: A Labor Lawyer’s Guide to Doing a Rate Hearing.”
4. I have applied for admission *pro hac vice* before the Commission for the PECO rates cases (Docket Nos. R-2024-3046932 and R-2024-3046931). I have not applied for admission *pro hac vice* in any other pending actions in any court of record in Pennsylvania.

5. I have never had an application for admission *pro hac vice* denied in any court of record in Pennsylvania.

6. If granted *pro hac vice* admission, 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.

7. If granted *pro hac vice* admission, I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.

8. If granted *pro hac vice* admission, I consent to the appointment of the sponsor 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.

Dated: May 15, 2024

Respectfully submitted,

/s/ Nicholas J. Enoch

Nicholas J. Enoch, Esq.  
Lubin & Enoch, P.C.  
349 North Fourth Avenue  
Phoenix, Arizona 85003  
Ph. (602) 234-0008  
Email: [nick@lubinandenoch.com](mailto:nick@lubinandenoch.com)