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John H. Isom

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File #: 2507/140068

August 13, 2009

BY HAND

James J. McNulty  
Secretary  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
PO Box 3265  
Harrisburg, PA 17105-3265

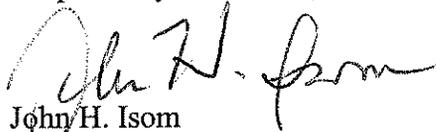
**RE: Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Pennsylvania Portion of The Proposed Susquehanna-Roseland 500 kV Transmission Line in Portions of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania, etc. - Docket Nos. A-2009-2082652, et al**

Dear Secretary McNulty:

Enclosed for filing is the original Motion of PPL Electric Utilities Corporation for Admission of Curtis S. Renner *Pro Hac Vice* in the above-referenced proceeding.

As indicated on the certificate of service, copies have been provided to the parties in the manner indicated.

Respectfully Submitted,



John H. Isom

JHI/jl

Enclosures

cc: Honorable Susan D. Colwell  
Certificate of Service

## 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

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Bushkill, PA 18324)

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Bath, PA 18014-8738

Patrick J. Lavelle  
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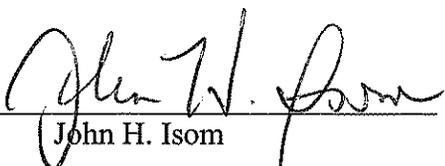
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Rudolph Saporito and Maria Saporito  
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HaRa Corporation  
c/o F. Andrew Wolf, Corporate Counsel  
Bushkill Group  
Route 209  
PO Box 447  
Bushkill, PA 18324

Date: August 13, 2009

  
John H. Isom

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PPL Electric Utilities :  
Corporation Filed Pursuant to 52 Pa. Code : Docket No. A-2009-2082652  
Chapter 57, Subchapter G, for Approval of :  
the Siting and Construction of the :  
Pennsylvania Portion of The Proposed :  
Susquehanna-Roseland 500 kV Transmission :  
Line in Portions of Lackawanna, Luzerne, :  
Monroe, Pike and Wayne Counties, :  
Pennsylvania :

Petition of PPL Electric Utilities Corporation :  
For A Finding That A Building To Shelter : Docket No. A-2009-2082832  
Equipment At The 500-230kV Substation To :  
Be Constructed In the Borough of Blakely, :  
Lackawanna County, Pennsylvania is :  
Reasonably Necessary For The Convenience :  
Or Welfare Of The Public :

Application of PPL Electric Utilities :  
Corporation 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 Right-Of- :  
Way And Easement Over And Across The :  
Lands Of The Property Owners Listed Below :  
For The Proposed Susquehanna-Roseland :  
500 kV Transmission Line in Portions of :  
Lackawanna, Luzerne, Monroe, Pike and :  
Wayne Counties, Pennsylvania Is Necessary :  
or Proper For The Service, Accommodation, :  
Convenience Or Safety Of The Public :

Chaudari Family Limited Partnership, : Docket No. A-2009-2088297  
David Murphy, and Marguerite T. :  
Kranick :

HaRa Corporation : Docket No. A-2009-2088337

Richard Coccodrilli, Jr., Jeffrey J. : Docket No. A-2009-2088327  
Coccodrilli, Ryan T. Coccodrilli, and :  
Joseph Williams :

D&L Realty Company : Docket No. A-2009-2088340  
Kenneth Powell and Linda Powell : Docket No. A-2009-2088359  
Rudolph Saporito and Maria Saporito : Docket No. A-2009-2088312  
David Murphy : Docket No. A-2009-2088360

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION  
FOR ADMISSION OF CURTIS S. RENNER *PRO HAC VICE***

To Administrative Law Judge Susan D. Colwell:

Pursuant to 52 Pa. Code § 1.22(b) and Pa. B.A.R., § 301(b), I, John H. Isom, Esquire, respectfully request that the Pennsylvania Public Utility Commission (“Commission”) admit Curtis S. Renner, Esquire, *pro hac vice* in the above-captioned proceeding. In support thereof, I represent as follows:

1. I, John H. Isom, am an attorney of law duly admitted to practice before the Supreme Court of Pennsylvania. I am a member in good standing of the Bar of the Commonwealth, and my attorney identification number is 16569.

2. I am an attorney for PPL Electric Utilities Corporation (“PPL Electric”) and am counsel of record for PPL Electric in the above-captioned proceeding.

3. Curtis S. Renner, Esquire, is associated with PPL Electric, and I request that he be admitted *pro hac vice* in this proceeding.

4. Curtis S. Renner is a partner in the Washington, D.C. law firm of Watson & Renner. He has over 20 years of litigation and trial experience in state and federal courts and regulatory agencies. Mr. Renner is an active member in good standing of the Bar of the District of Columbia. He was admitted to the Bar of the State of Massachusetts in 1988 (currently

inactive) and the Bar of the District of Columbia in 1995. He is also admitted to practice before the U.S. District Courts in the District of Columbia and Maryland. Mr. Renner has previously been admitted to appear before the Commission in the following matters: *Application Of Pennsylvania Power & Light Company For Approval Of The Proposed Hoffman-Minooka 138/69 kV Supply Line*, Docket No. A-110500F0172;; *Denning v. Pennsylvania Electric Co.*, Docket No. C-00003788. Mr. Renner's supporting verification is attached hereto as "Appendix A."

WHEREFORE, I, John H. Isom, Esquire, respectfully request that the Pennsylvania Public Utility Commission admit Curtis S. Renner, Esquire, Esquire *pro hac vice* on behalf of the PPL Electric Utilities Corporation in the above-captioned proceeding.

Respectfully submitted,



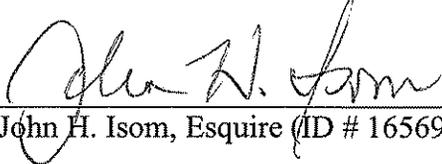
John H. Isom (ID # 16569)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: jisom@postschell.com

Date: August 13, 2009

Attorney for PPL Electric Utilities Corporation

## VERIFICATION

I, John H. Isom, do hereby verify and state that the factual statements contained in the foregoing Motion for Admission *Pro Hac Vice* are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

  
John H. Isom, Esquire (ID # 16569)

Dated: August 13, 2009

**APPENDIX A**

**Verification Of Curtis S. Renner, Esquire  
In Support Of Motion For Admission *Pro Hac Vice***

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Application of PPL Electric Utilities :  
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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 Right-Of- :  
Way And Easement Over And Across The :  
Lands Of The Property Owners Listed Below :  
For The Proposed Susquehanna-Roseland :  
500 kV Transmission Line in Portions of :  
Lackawanna, Luzerne, Monroe, Pike and :  
Wayne Counties, Pennsylvania Is Necessary :  
or Proper For The Service, Accommodation, :  
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Kranick :

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Richard Coccodrilli, Jr., Jeffrey J. : Docket No. A-2009-2088327  
Coccodrilli, Ryan T. Coccodrilli, and :  
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Kenneth Powell and Linda Powell : Docket No. A-2009-2088359  
Rudolph Saporito and Maria Saporito : Docket No. A-2009-2088312  
David Murphy : Docket No. A-2009-2088360

**VERIFICATION OF CURTIS S. RENNER, ESQUIRE  
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

I, Curtis S. Renner, do hereby depose and state:

1. I submit this Verification in Support of the Motion for Admission *Pro Hac Vice* submitted by John H. Isom, Esquire on behalf of PPL Electric Utilities Corporation (“PPL Electric”) in the above-captioned proceeding.

2. I am an attorney and a member in good standing of the Bar of the District of Columbia. I am also admitted to practice before the U.S. District Courts in the District of Columbia and Maryland. I was admitted to the Bar of the State of Massachusetts in 1988 (currently inactive) and the Bar of the District of Columbia in 1995.

3. I am a partner in the Washington, D.C. law firm of Watson & Renner. I have over 20 years of litigation and trial experience before state and federal courts and regulatory agencies. My contact information is as follows:

Curtis S. Renner  
Watson & Renner  
1400 16<sup>th</sup> Street, NW  
Suite 350  
Washington, DC 20036  
(202) 737 6302  
crenner@w-r.com

4. I have substantial experience in the public utility law practice area and over the past 20 years I have appeared in administrative hearings involving public utility commission permitting of transmission lines in many states. I have previously appeared in the following matters before this Commission: *Application Of Pennsylvania Power & Light Company For Approval Of The Proposed Hoffman-Minooka 138/69 kV Supply Line*, Docket No. A-110500F0172; *Denning v. Pennsylvania Electric Co.*, Docket No. C-00003788. Watson & Renner and I are currently assisting PPL Electric with regard to the proposed Susquehanna – Roseland 500 kV transmission line.

5. PPL Electric has requested that I appear and assist in the above-captioned proceeding to protect and defend PPL Electric's interests. I am associated with John H. Isom, Esquire, who is a member in good standing of the Pennsylvania Bar and is counsel for PPL Electric in this proceeding.

6. I understand that I will be bound by the Rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and Pennsylvania Rules of Professional Conduct with regard to my actions in this proceeding.

7. The above facts are true and correct to the best of my information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



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Curtis S. Renner, Esquire