



LAW OFFICES OF  
BENJAMIN L. WILLEY, LLC

June 9, 2010

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**VIA HAND DELIVERY**

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

Re: Petition of Metropolitan Edison Company and Pennsylvania Electric  
Company for Approval of Their Default Service Programs  
Docket Nos. P-2009-2093053 and P-2009-2093054

Retail Energy Supply Association v Metropolitan Edison Company and  
Pennsylvania Electric Company  
Docket Nos. C-2010-2178216 and C-2010-2178227

Dear Secretary Chiavetta:

Enclosed for filing in the proceedings captioned above are an original and three copies of the York County Solid Waste and Refuse Authority's *Petition to Intervene* and an original and three copies of a *Motion for Admission Pro Hac Vice*. The enclosed pleadings have been served in accordance with the Certificate of Service attached to each of them.

One additional copy each pleading is enclosed. Please date stamp the extra copy each pleading and return it to the courier for return to this office.

If you have any questions about this filing, please call me at your convenience at 301-941-1972.

Sincerely,

Benjamin L. Willey

Encls:

Copy to:

David Vollero, Executive Director, YCSWA

Robert M. Strickler Esq. 215 WISCONSIN AVENUE, SUITE 300, BETHESDA, MD 20814

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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|   |   |  |
|---|---|--|
| Petition of Metropolitan Edison Company | : |  |
| and Pennsylvania Electric Company       | : | Docket Nos. P-2009-2093053 and         |
| for Approval of their                   | : | P-2009-2093054                         |
| Default Service Program                 | : |  |
|   | : |  |
| Retail Energy Supply Association        | : |  |
| v.                                      | : | Docket Nos. C-2010- <u>2178216</u> and |
| Metropolitan Edison Company and         | : | C-2010- <u>2178227</u>                 |
| Pennsylvania Electric Company           | : |  |

**THE YORK COUNTY SOLID WASTE AND REFUSE AUTHORITY'S  
MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 5.103 of the Rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission (the "Commission"), and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for the York County Solid Waste and Refuse Authority ("YCSWA"), Robert M. Strickler, Esquire, of the law firm of Griffith, Strickler, Lerman, Solymos & Calkins, respectfully moves the Presiding Administrative Law Judge for entry of an Order granting admission *pro hac vice* to Benjamin L. Willey, Esquire, as counsel for the YCSWA for all purposes in relation to these proceedings.

In support of this Motion, the Movant, Robert M. Strickler, avers as follows:

1. Pursuant to PUC Rule 1.24(b)(1), the Movant has entered his appearance as counsel of record for the YCSWA in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Attorney Registration No. 07496), and is a Member of the law firm of Griffith, Strickler, Lerman, Solymos & Calkins, with its principal office in York, Pennsylvania.
2. Benjamin L. Willey, Esquire, is a Member of the Law Offices of Benjamin L. Willey, LLC, which maintains its principal office at 7272 Wisconsin Avenue, Suite 300, Bethesda, Maryland, 20814.

3. Mr. Willey is a 1976 graduate of the University of Maryland School of Law. He has been a member in good standing of the Bar of the State of Maryland since 1976 and of the Bar of the District of Columbia since 1999.

4. Benjamin L. Willey has experience and particular expertise in various aspects of regulatory and energy law, has appeared in numerous proceedings before the Federal Energy Regulatory Commission, state and federal courts, and state and federal administrative bodies, including the Pennsylvania Public Utility Commission, the Commonwealth Court of Pennsylvania, and the Supreme Court of Pennsylvania.

5. Wherefore, Robert M. Strickler, Movant and Counsel of Record for the YCSWA, respectfully moves for admission of Benjamin L. Willey, *pro hac vice*, on behalf of the YCSWA for all permissible purposes in relation to these proceedings.

Date: June 9, 2010



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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of Metropolitan Edison Company :  
and Pennsylvania Electric Company : Docket Nos. P-2009-2093053 and  
for Approval of their : P-2009-2093054  
Default Service Program :  
:  
:  
Retail Energy Supply Association :  
v. : Docket Nos. C-2010- 2178216 and  
Metropolitan Edison Company and : C-2010- 2178227  
Pennsylvania Electric Company :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Motion for Admission *Pro Hac Vice* on the participants, listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

Date: June 9, 2010

**Service by Hand Delivery, Addressed as Follows:**

Rosemary Chiavetta  
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**Service by Electronic Mail and by USPS First-Class Mail, Postage Prepaid Addressed as Follows:**

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