



McNees
Wallace & Nurick LLC

100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Charis Mincavage
Direct Dial: 717.237.5437
Direct Fax: 717.260.1725
cmincavage@mwn.com

January 14, 2011

VIA HAND DELIVERY

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

**RE: Philadelphia Gas Works' Petition to Modify its Universal Services and Energy Conservation Plans With Respect to the Customer Responsibility Program;
Docket No. P-2010-2178610**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the original and three (3) copies of the Motion for Admission Pro Hac Vice of Patrick L. Gregory on behalf of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"), in the above-referenced proceeding, along with an accompanying Verification Statement.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp an extra copy of this transmittal letter and Motion, and kindly return them for our filing purposes. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

/lmc/km

Enclosures

c: Administrative Law Judge Christopher Pell (via E-mail and First-Class Mail)
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PHILADELPHIA GAS WORKS' PETITION :
TO MODIFY ITS UNIVERSAL SERVICES :
AND ENERGY CONSERVATION PLANS : Docket No. P-2010-2178610
WITH RESPECT TO THE CUSTOMER :
RESPONSIBILITY PROGRAM :

MOTION FOR ADMISSION PRO HAC VICE OF PATRICK L. GREGORY

Charis Mincavage, on behalf of the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG"), hereby moves for the admission *pro hac vice* of Patrick L. Gregory to appear and participate on PICGUG's behalf in this proceeding.

1. Charis Mincavage is a member in good standing in the Bar of the Supreme Court of Pennsylvania holding Bar I.D. No. 82039.
2. Patrick L. Gregory is a member of the State Bar of Virginia, license No. 29872987 His business address is:

McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Tel: 717.237.5378
Fax: 717.260.1776
pgregory@mwn.com

3. Mr. Gregory is not now, nor has he ever been, under any order of discipline by any disciplinary board and is a member in good standing of the State Bar of Virginia.
4. Mr. Gregory is of good moral and professional character and, if requested, will swear and affirm and demean himself as an attorney and counselor of this Court, uprightly and according to law, and that he will support the Constitution of the United States.

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5. Mr. Gregory has previously been admitted *pro hac vice* in one pending proceeding before the Pennsylvania Public Utility Commission and has never been denied admission *pro hac vice*.
6. After reasonable investigation, I believe Mr. Gregory to be a reputable and competent attorney, and I am in a position to recommend his admission.
7. Except for this proceeding, I am not acting as the sponsor of a candidate for admission *pro hac vice* in any courts of record in this Commonwealth of Pennsylvania.
8. The proceeds from the resolution of the proceeding for which Mr. Gregory seeks to be admitted *pro hac vice* will be received, held, and distributed in accordance with the Pennsylvania Professional Rules of Conduct.

WHEREFORE, it is respectfully requested that Patrick L. Gregory be admitted *pro hac vice* in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage (Pa. I.D. 82039)
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: 717.232.8000
Fax: 717.237.5300
E-mail: cmincavage@mwn.com

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated: January 14, 2011

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PHILADELPHIA GAS WORKS' PETITION :
TO MODIFY ITS UNIVERSAL SERVICES :
AND ENERGY CONSERVATION PLANS : Docket No. P-2010-2178610
WITH RESPECT TO THE CUSTOMER :
RESPONSIBILITY PROGRAM :

VERIFICATION STATEMENT PATRICK L. GREGORY

1. I am a member of the State Bar of Virginia, license No. 72987.
2. I have never been suspended, disbarred, or otherwise disciplined in the State of Virginia or any other jurisdiction. I am not subject to any disciplinary proceedings.
3. I have previously been admitted *pro hac vice* in one pending proceeding before the Pennsylvania Public Utility Commission and have never been denied admission *pro hac vice*.
4. 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.
5. 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 this matter.

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6. I consent to the appointment of Charis Mincavage, Esquire, 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 this matter.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Patrick L. Gregory, Esquire
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: 717.232.8000
Fax: 717.237.5300
E-mail: pgregory@mwn.com

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Dated: January 14, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this day served 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 AND FIRST-CLASS MAIL

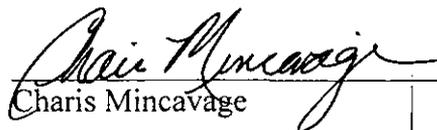
Daniel Clearfield, Esq.
Edward G. Lanza, Esq.
Eckert Seamans Cherin & Mellott LLC
213 Market Street - 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
elanza@eckertseamans.com

Adeolu Bakare, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
abakare@state.pa.us

Sharon E. Webb, Esq.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101
swebb@state.pa.us

Christy M. Appleby, Esq.
Tanya J. McCloskey, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
cappleby@paoca.org
tmccloskey@paoca.org

Philip Bertocci, Esq.
Thu B. Tran, Esq.
Community Legal Services Inc.
1424 Chestnut Street
Philadelphia, PA 19103
pbertocci@clsphila.org
ttran@clsphila.org


Charis Mincavage

Dated this 14th day of January, 2011, in Harrisburg, Pennsylvania.

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