

**ECKERT
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November 29, 2012

Via Electronic Filing

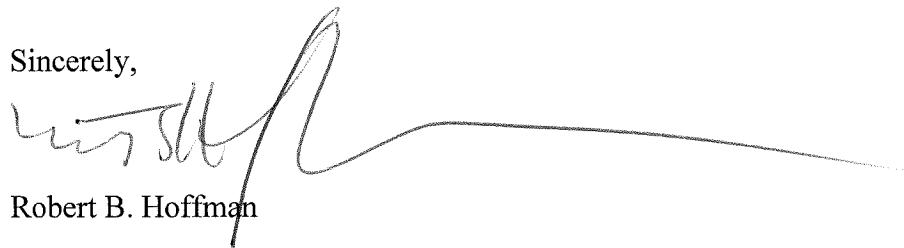
Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: PA Public Utility Commission, Bureau of Investigation and Enforcement v. Glacial Energy of Pennsylvania, Inc., Docket No. C-2012-2297092

Dear Secretary Chiavetta:

On behalf of Glacial Energy of Pennsylvania, Inc. ("Glacial Energy") enclosed is the original of its Motion for Admission *Pro Hac Vice* with regard to the above-referenced matter which has been electronically filed today with the Commission. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,



Robert B. Hoffman

RBH

Enclosure

cc: Cert. of Service w/enc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

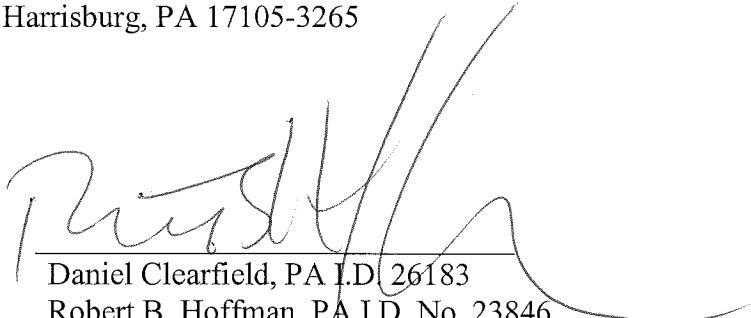
Pennsylvania Public Utility Commission,)	
Bureau of Investigation and Enforcement)	
Petitioner,)	
v.)	Docket No. C-2012-2297092
)	
Glacial Energy of Pennsylvania, Inc.)	
Respondent.)	

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November, 2012, I caused a true and correct copy of the Respondent's Motion for Admission *pro hac vice* to be served upon the following persons by first class mail, postage prepaid, in accordance with the requirements of 52 Pa. Code § 1.54:

Heidi L. Wushinske
Prosecutor
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265

Wayne T. Scott
First Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265



Daniel Clearfield, PA I.D. 26183
Robert B. Hoffman, PA I.D. No. 23846
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, Eighth Floor
Harrisburg, PA 17101
Tel: (717) 237-7182
rhoffman@eckertseamans.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,)	
Bureau of Investigation and Enforcement)	
Petitioner,)	
v.)	Docket No. C-2012-2297092
)	
Glacial Energy of Pennsylvania, Inc.)	
Respondent.)	

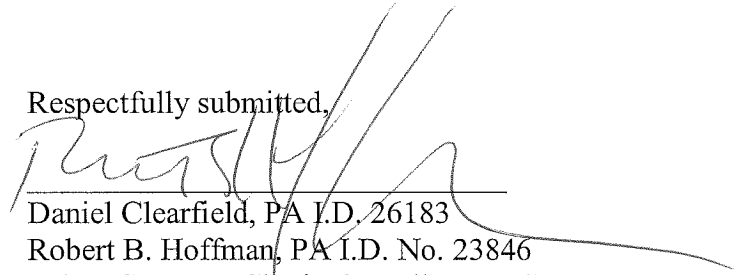
**MOTION FOR ADMISSION *PRO*
HAC VICE OF COUNSEL FOR RESPONDENT**

Pursuant to 52 Pa. Code §§1.22 ,1.23, Pa. B.A.R. 301(a), and Pa. R.C.P. 1012.1(d)(1) Robert Hoffman of Eckert Seamans Cherin & Mellott, LLC, hereby moves for the admission *pro hac vice* of John McGahren and Stephanie Feingold to appear in this matter on behalf of Respondent Glacial Energy of Pennsylvania, Inc. In support of this Application, applicant states the following:

1. Verified Statements of Robert Hoffman and of Mr. McGahren and Ms. Feingold are attached hereto as Exhibits A-C, respectively.
2. The candidates are members in good standing of the jurisdictions listed in their respective Statements and have never been suspended, disbarred or otherwise disciplined by any court or administrative body.
3. Mr. McGahren and Ms. Feingold are partners in the New Jersey Office of Patton Boggs LLP.
4. Patton Boggs serves as national counsel for Glacial Energy Holdings, the parent company of Glacial Energy of Pennsylvania.
5. Glacial Energy of Pennsylvania has requested that the candidates participate in its representation in this matter.

WHEREFORE, the undersigned respectfully moves that John McGahren and Stephanie Feingold be admitted to appear *pro hac vice* on behalf of Respondent Glacial Energy of Pennsylvania, Inc. in this proceeding.

Respectfully submitted,

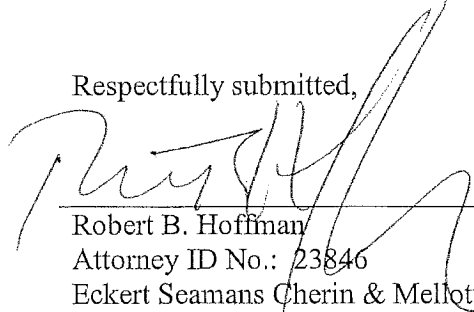


Daniel Clearfield, PA I.D. 26183
Robert B. Hoffman, PA I.D. No. 23846
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Harrisburg, PA 17101
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rhoffman@eckertseamans.com

Exhibit A

5. Any proceeds from any settlement in this matter will be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

Respectfully submitted,



Robert B. Hoffman
Attorney ID No.: 23846
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101
717.255.3744
Fax 717.237.6019

Exhibit B

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,)
Bureau of Investigation and Enforcement)
Petitioner,)
v.)
Glacial Energy of Pennsylvania, Inc.)
Respondent.)

Docket No. C-2012-2297092

VERIFICATION OF JOHN MCGAHREN, ESQUIRE

I, JOHN MCGAHREN, do hereby state subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney not currently admitted to the bar of the Commonwealth of Pennsylvania and am seeking permission to appear *pro hac vice* before the Pennsylvania Public Utility Commission on behalf of Respondent Glacial Energy of Pennsylvania, Inc., in this matter.
2. I am admitted to practice in the states of New Jersey (Attorney ID No. 046791990), New York, and West Virginia.
3. I am admitted to practice as well in the United States Supreme Court, the United States Courts of Appeals for the 1st, 2nd, 3rd and Federal Circuits, and the United States Court of Federal Claims.
4. I am a member in good standing in each state and court listed above.
5. I am not now nor have I ever been suspended, disbarred, or otherwise disciplined in any court or administrative body. I am not, nor have I ever been, subject to any disciplinary proceedings.

Exhibit B

6. I have never been denied *pro hac vice* admission in any other Commission proceeding nor are there any current pending requests for such admission.

7. I am the managing partner in the New Jersey Office of Patton Boggs LLP. My practice involves a wide variety of environmental litigation, enforcement and compliance matters, ranging from hazardous waste litigation to counseling industrial clients on federal and state regulatory matters. I represent clients on products liability, toxic tort and government contract claims.

8. Patton Boggs serves as national counsel for Glacial Energy Holdings (“Glacial Energy”), the parent company of Glacial Energy of Pennsylvania, Inc., and I have participated in Patton Boggs’ representation of Glacial Energy and its subsidiaries throughout the country.

9. I am familiar with the Pennsylvania Rules of Professional Conduct, the Pennsylvania Rules of Disciplinary Enforcement, and the rules and court procedures of the Public Utility Commission.

10. If granted *pro hac vice* admission, I will comply with and be bound by the applicable statutes, case law and procedural rules of the Public Utility Commission and, as applicable, the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

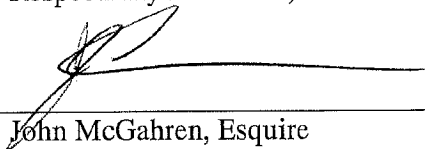
11. If granted *pro hac vice* admission, I agree to submit to the jurisdiction of the Pennsylvania Public Utility Commission and, to the extent applicable, the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my *pro hac vice* admission.

12. I consent to the appointment of Robert Hoffman and Daniel Clearfield of the law firm of Eckert Seamans Cherin & Mellott, LLC as the agents upon whom service of process shall

Exhibit B

be made for all actions, including disciplinary actions, that may arise out of the practice of law in this matter for which *pro hac vice* admission is sought.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John McGahren", is written over a horizontal line.

John McGahren, Esquire
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, NJ 07102

Exhibit C

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,)
Bureau of Investigation and Enforcement)
Petitioner,)
v.)
Glacial Energy of Pennsylvania, Inc.)
Respondent.)

Docket No. C-2012-2297092

VERIFICATION OF STEPHANIE R. FEINGOLD

I, Stephanie R. Feingold, hereby state subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney not currently admitted to the bar of the Commonwealth of Pennsylvania and am seeking permission to appear *pro hac vice* before the Pennsylvania Public Utility Commission on behalf of Respondent Glacial Energy of Pennsylvania, Inc., in this matter.
2. I am admitted to practice in the states of New Jersey (Attorney ID No. 023182005), New York, and West Virginia.
3. I am admitted to practice as well in the United States District Courts for New Jersey, the Eastern and Southern Districts of New York, and the Southern District of West Virginia.
4. I am a member in good standing in each state and court listed above.
5. I am not now nor have I ever been suspended, disbarred, or otherwise disciplined in any court or administrative body. I am not, nor have I ever been, subject to any disciplinary proceedings.

Exhibit C

6. I have never been denied *pro hac vice* admission in any other Commission proceeding nor are there any current pending requests for such admission.

7. I am a partner in the New Jersey office of Patton Boggs LLP. My practice focuses on litigation, regulatory and commercial matters, environmental and land use regulatory counseling, and administrative proceedings. I have counseled major corporations in connection with enforcement actions by environmental agencies and governmental authorities and also represented major corporations, insurers and reinsurers in litigation, mediation and arbitration.

8. Patton Boggs serves as national counsel for Glacial Energy Holdings (“Glacial Energy”), the parent company of Glacial Energy of Pennsylvania, Inc., and I have participated in Patton Boggs’ representation of Glacial Energy and its subsidiaries throughout the country.

9. I am familiar with the Pennsylvania Rules of Professional Conduct, the Pennsylvania Rules of Disciplinary Enforcement, and the rules and court procedures of the Public Utility Commission.

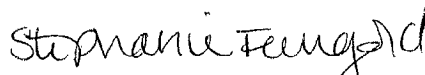
10. If granted *pro hac vice* admission, I will comply with and be bound by the applicable statutes, case law and procedural rules of the Public Utility Commission and, as applicable, the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

11. If granted *pro hac vice* admission, I agree to submit to the jurisdiction of the Pennsylvania Public Utility Commission and, to the extent applicable, the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my *pro hac vice* admission.

Exhibit C

12. I consent to the appointment of Robert Hoffman and Daniel Clearfield of the law firm of Eckert Seamans Cherin & Mellott, LLC as the agents 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 for which *pro hac vice* admission is sought.

Respectfully submitted,



Stephanie Feingold, Esquire
Patton Boggs LLP
One Riverfront Plaza, 6th Floor
Newark, NJ 07102