

Citizens for Pennsylvania's Future
200 First Avenue, Suite 200
Pittsburgh, PA 15222
(412) 456-2901

October 3, 2014

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17015-3265

Re: Petition of Pennsylvania Power Company for approval of Base Rate Increase and various Riders, Docket No. R-2014-2428744

Dear Secretary Chiavetta:

Enclosed, please find an original copy of Motion for Admission Pro Hac Vice of John Finnigan in the above captioned matter.

Copies are being served in accordance with the attached Certificate of Service.

Sincerely,



Heather M. Langeland

cc. Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC
UTILITY COMMISSION,

v.

PENNSYLVANIA POWER
COMPANY

:
:
:
:
:
:
:
:
:
:
:

Docket No. R-2014-2428744

CERTIFICATE OF SERVICE

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing document was served on all parties of record this 3rd day of October, 2014 by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

Allison C. Kaster, Esq.
Carrie B. Wright, Esq.
Scott B. Granger, Esq.
Bureau of Investigation and Enforcement
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

Darryl A. Lawrence
Aron J. Beatty
Kristine Robinson
Brandon J. Pierce
Lauren M. Burge
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101-1923

Thomas P. Gadsden, Esq.
Anthony DeCusatis, Esq.
Catherine G. Vasudevan, Esq.
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921

Tori L. Giesler, Esq.

Lauren M. Lepkoski, Esq.
First Energy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

Daniel G. Asmus, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Senator Timothy J. Solobay
Senate of Pennsylvania – 46th District
Senate Box 203046
Room 15-EW
The State Capitol
Harrisburg, PA 17120

Senator Pam Snyder
Senate of Pennsylvania – 50th District
Senate Box 203046
Room 15-EW
The State Capitol
Harrisburg, PA 17120-3046

Bradley A. Bingaman, Esq.
FirstEnergy
76 South Main Street
Akron, OH 44308-1890

Susan E. Bruce, Esq.
Vasiliki Karandikas, Esq.
Teresa K. Schmittberger, Esq.
Elizabeth P. Trinkle, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Scott J. Rubin, Esq.
333 Oak Lane
Bloomsburg, PA 17815-2036

Karla Lamison
4238 Guitonville Rd.

Marienville, PA 16239

Joan E. Group
1040 Rosewood Drive
Altoona, PA 16601

Bruce R. Hilbert
Sara P. Hilbert
441 Orchard Road
Fleetwood, PA 19522

Paul N. Bombaci
5 Governours Place
York, PA 17402

James F. Mrozek
1199 Cleland Mill Road
New Castle, PA 16102


Heather M. Langeland

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pennsylvania Power Company : R-2014-2428744
for approval of Rate Increase :

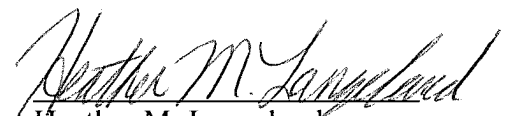
MOTION FOR ADMISSION PRO HAC VICE

I, Heather M. Langeland, state the following:

1. Pursuant to 231 Pa. Code 1012.1, I hereby move for admission pro hac vice of candidate John Finnigan to practice before the Pennsylvania Public Utilities Commission in the above-captioned docket. I reasonably believe John Finnigan to be a reputable and competent attorney, and accordingly, as his sponsor for admission, recommend him for admission.
2. In support of this motion, a verification from candidate John Finnigan is attached hereto, as per 231 Pa. Code 1012.1(c).
3. Additionally in support of this motion, I am supplying attached hereto a sponsor verification, as per 231 Pa. Code 1012(d)(2).

WHEREFORE, it is respectfully requested that the Administrative Law Judge enter an order granting admission pro hac vice to John Finnigan in the above-captioned proceeding.

Date: October 3, 2014



Heather M. Langeland
Pa. Bar ID No. 207387
Citizens for Pennsylvania's
Future
200 First Avenue, Suite 200
Pittsburgh, PA 15222
Tel: (412)456-2901
Fax: 412-690-5105
langeland@pennfuture.org

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pennsylvania Power Company : R-2014-2428744
for approval of Rate Increase : '

**CANDIDATE'S VERIFIED STATEMENT IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**

I, John Finnigan, state the following:

1. I am a member in good standing of the Ohio State Bar and Kentucky State Bar:

Ohio Bar Association
1700 Lake Shore Drive
Columbus, OH 43204

Kentucky Bar Association
514 W. Main Street
Frankfort, Ky., 40601-1812

My bar number for the Ohio State Bar is 0018689 and my bar number for the Kentucky Bar is 86657.

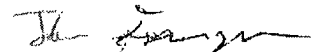
2. With respect to the jurisdiction in which I am licensed, I have never been suspended, disbarred, or otherwise disciplined. Nor am I subject to any disciplinary proceedings before either jurisdiction.
3. In addition to the above-captioned matter referenced in the accompanying Motion for Admission Pro Hac Vice, I am contemporaneously applying for admission pro hac vice before the following Pennsylvania Public Utility Commission dockets:
 - Petition of Metropolitan Edison Company Petition for approval of Rate Increase, R-2014-2428745
 - Petition of Pennsylvania Electric Company for approval of Rate Increase, R-2014-2428743

- Petition of West Penn Power Company for approval of Rate Increase, R-2014-2428742

Admission pro hac vice before these dockets has not yet been granted or denied.

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 the appearance in the above-captioned matter referenced in the accompanying Motion for Admission Pro Hac Vice.
6. I have consented to the appointment of Heather M. Langeland, the sponsor of the accompanying Motion for Admission Pro Hac Vice, 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 above-captioned matter in which admission pro hac vice is sought.

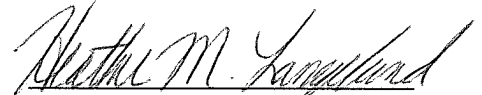
Date: October 3, 2014



John Finnigan
128 Winding Brook Lane
Terrace Park, Ohio 45174
Phone: (212) 505-2100
Fax: (212) 505-2375
Email: jfinnigan@edf.org

3. The proceeds from the settlement of any cause of action in which candidate John Finnigan is granted admission pro hac vice 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 thereof, if applicable.

Date: October 3, 2014



Heather M. Langeland
Pa. Bar ID No. 207387
Citizens for Pennsylvania's
Future
200 First Avenue, Suite 200
Pittsburgh, PA 15222
Tel: (412)456-2901
Fax: 412-690-5105
langeland@pennfuture.org