

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, 2<sup>nd</sup> Floor North  
P.O. Box 3265  
Harrisburg, PA 17015-3265

Re: Petition of Pennsylvania Electric Company for approval of Base Rate Increase and various Riders, Docket No. R-2014-2428743

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,

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Docket No. R-2014-2428743

v.

PENNSYLVANIA ELECTRIC  
COMPANY

**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:

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New Castle, PA 16102

  
Heather M. Langeland

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pennsylvania Electric Company                   :                   R-2014-2428743  
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  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pennsylvania Electric Company                   :                   R-2014-2428743  
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:

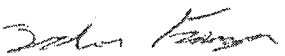
- Petition of Metropolitan Edison Company Petition for approval of Rate Increase, R-2014-2428745
- Petition of Pennsylvania Power Company for approval of Rate Increase, R-2014-2428744

- 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](mailto:jfinnigan@edf.org)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pennsylvania Electric Company                   :                   R-2014-2428743  
for approval of Rate Increase                                    :

**SPONSOR’S VERIFIED STATEMENT IN SUPPORT OF MOTION FOR ADMISSION  
PRO HAC VICE**

I, Heather M. Langeland, state the following:

1. After reasonable investigation, I reasonably believe that John Finnigan to be a reputable and competent attorney. Accordingly, I am in a position to recommend his admission pro hac vice in the above-captioned matter.
2. I am acting as the sponsor of a candidate for admission pro hac vice in the following cases in all courts of record in this Commonwealth:
  - For Michael Panfil, Esq. in the following cases: 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 Pennsylvania Power Company for approval of Rate Increase, R-2014-2428744; Petition of West Penn Power Company for approval of Rate Increase, R-2014-2428742.
  - For John Finnigan, Esq. in the following cases: Petition of Metropolitan Edison Company Petition for approval of Rate Increase, R-2014-2428745; Petition of Pennsylvania Power Company for approval of Rate Increase, R-2014-2428744; Petition of West Penn Power Company for approval of Rate Increase, R-2014-2428742.

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



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