

SUTHERLAND

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October 29, 2014

VIA FEDERAL EXPRESS

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

**Re: TERM Power & Gas LLC d/b/a ENCOA
Motion of Admission *Pro Hac Vice* of James E. Guy
Docket No. C-2014-2429173**

Dear Secretary Chiavetta:

Enclosed for filing please find an original of a Motion for Admission *Pro Hac Vice* in the above-referenced docket of James E. Guy.

This filing also includes an extra copy for our records. Please date-stamp this extra copy and return it at your earliest convenience using the enclosed self-addressed, stamped envelopes. Thank you for your assistance, and please contact me if you have any questions regarding this matter.

Respectfully submitted,


Joshua L. Belcher

*Attorney for TERM Power & Gas LLC d/b/a
ENCOA*

Enclosures

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ATLANTA AUSTIN GENEVA HOUSTON LONDON NEW YORK SACRAMENTO WASHINGTON D.C.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MOHAMED ABDELWAHAB

Complainant,

v.

TERM POWER & GAS LLC d/b/a ENCOA

Respondent.

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Docket No. C-2014-2429173

MOTION FOR ADMISSION *PRO HAC VICE* OF JAMES E. GUY

Pursuant to the Pennsylvania Public Utility Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code § 1.22, and the Pennsylvania Bar Admission Rules, 204 Pa. Code Rule 301, Joshua L. Belcher, on behalf of TERM Power & Gas d/b/a ENCOA ("ENCOA"), hereby moves for the admission *pro hac vice* of James E. Guy to appear and participate as counsel on ENCOA's behalf in the captioned proceeding.

1. I, Joshua L. Belcher, am a member in good standing of the Bar of the Supreme Court of Pennsylvania, holding ID No. 313129.

2. Mr. Guy is an attorney with the law firm of Sutherland Asbill & Brennan LLP located in Austin, Texas. Mr. Guy is an attorney in good standing and an active member of the Texas Bar, Bar No. 24027061. Mr. Guy's business address and contact information is:

James E. Guy
Sutherland Asbill & Brennan LLP
600 Congress Avenue, Suite 2000
Austin, TX 78701-3238
Tel: 512-721-2700
Fax: 512-721-2656

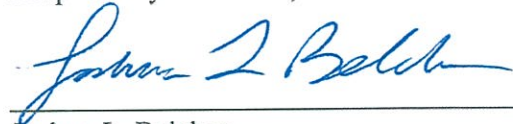
3. After reasonable investigation, I believe Mr. Guy to be a reputable and competent attorney, and I am in a position to recommend his admission.

4. There are no other cases in the courts of record in the Commonwealth of Pennsylvania for which I am acting as the sponsor of a candidate for admission *pro hac vice*.

5. Any proceeds from the settlement of the proceedings for which Mr. Guy seeks to be admitted *pro hac vice* 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.

WHEREFORE, for the reasons set forth above, Joshua L. Belcher respectfully requests that James E. Guy be admitted to practice *pro hac vice* before the Pennsylvania Public Utility Commission in this proceeding.

Respectfully submitted,



Joshua L. Belcher
Attorney ID No. 313129
SUTHERLAND ASBILL & BRENNAN LLP
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joshua.belcher@sutherland.com

Attorney for TERM Power & Gas LLC d/b/a ENCOA

Date: October 29, 2014

VERIFICATION

I, Joshua L. Belcher, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18. Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: October 29, 2014



Joshua L. Belcher

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Docket No. C-2014-2429173

VERIFICATION STATEMENT OF JAMES E. GUY

1. I am an attorney in good standing and an active member of the Texas Bar, Bar No. 24027061.

2. I have never been suspended, disbarred, or otherwise disciplined in Texas, or any other jurisdiction. I am not subject to any disciplinary proceedings.

3. I have not applied for nor am I currently appearing *pro hac vice* in any pending proceedings before the Pennsylvania Public Utility Commission or any court of record in Pennsylvania. I 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 Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance of this proceeding.

6. I consent to the appointment of Joshua L. Belcher 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 proceeding.

7. I, James Guy, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18. Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Respectfully submitted,



James E. Guy
Texas Bar No. 24027061
SUTHERLAND ASBILL & BRENNAN LLP
600 Congress Ave., Suite 2000
Telephone: (512) 721-2700
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james.guy@sutherland.com

*Attorney for TERM Power & Gas, LLC
d/b/a ENCOA*

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Motion for Admission *Pro Hac Vice* of James E. Guy, on behalf of TERM Power & Gas LLC d/b/a ENCOA, by first-class mail upon the persons addressed below, in accordance with the requirements of § 1.54 (relating to service by a party):

Mohamed Abdelwahab (Spatola's Pizza)
1801 N. Broad St.
Lansdale, PA 19446



Joshua L. Belcher
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joshua.belcher@sutherland.com

*Attorney for TERM Power & Gas LLC d/b/a
ENCOA*

Date: October 29, 2014