



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1981 Direct Fax
File #: 167945

October 31, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Mary Benhayon v. PPL Electric Utilities Corporation
Docket No. C-2018-3003491

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation for Admission *Pro Hac Vice*, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Honorable Elizabeth Barnes
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

Mary Benhayon
7450 Jackson Road
Mays Landing, NJ 08330

Date: October 31, 2018



Devin T. Ryan

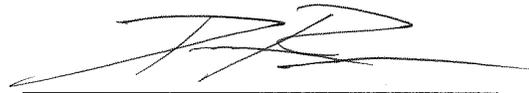
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Benhayon,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3003491
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE. YOUR ANSWERS SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-5696
Fax: 610-774-4101
E-mail: kklock@pplweb.com
mjshafer@pplweb.com



Devin T. Ryan (ID # 316602)
Garrett P. Lent (ID # 321566)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dryan@postschell.com
glent@postschell.com

Date: October 31, 2018

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Benhayon,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3003491
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION FOR
ADMISSION *PRO HAC VICE***

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and Rule 301(b) of the Pennsylvania Bar Admission Rules, Counsel of Record for PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), Devin T. Ryan, Esq., respectfully requests that Your Honor enter an Order granting admission *pro hac vice* to Curtis S. Renner, Esq., as counsel for PPL Electric for all purposes in relation to the above-captioned proceeding (“Motion”). In support thereof, the Movant, Devin T. Ryan, avers as follows:

1. Pursuant to Section 1.24(b)(1) of the Commission’s regulations, 52 Pa. Code § 1.24(b)(1), the Movant has entered his appearance as counsel of record for PPL Electric in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 316602), and is an Associate with Post & Schell, P.C., whose principal office is in Philadelphia, Pennsylvania.

2. Curtis S. Renner is a Partner in the Washington, D.C. law firm of Watson & Renner at 1901 Pennsylvania Avenue, NW, Suite 1005, Washington, DC 20006.

3. Mr. Renner is a 1988 graduate of Harvard Law School. He was admitted to the Massachusetts Bar in 1988 (currently inactive) and has been a member in good standing of the Bar of the District of Columbia since 1995. He also is admitted to practice before the U.S. District Courts in the District of Columbia and Maryland.

4. Mr. Renner has experience and particular expertise in various aspects of regulatory and public utility law and has appeared in numerous proceedings before the Pennsylvania Public Utility Commission (“Commission”) and other state utility commissions. Specifically, he has appeared in the following matters before the Commission:

<i>Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Pennsylvania Portion of The Proposed Susquehanna-Roseland 500 kV Transmission Line in Portions of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania</i>	Docket Nos. A-2009-2082652, et al
<i>Application Of Pennsylvania Power & Light Company For Approval Of The Proposed Hoffman-Minooka 138/69 kV Supply Line</i>	Docket No. A-110500F0172
<i>Denning v. Pennsylvania Electric Co.</i>	Docket No. C-00003788
<i>Kathleen R. Anthony v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000490
<i>Carolyn & Peter Bamberger v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000358
<i>Donna Bervinchak & J. Jude Bervinchak v. PPL Electric Utilities Corporation</i>	Docket Nos. C-2016-2572824 and C-2016-2577527
<i>Michelle Carbaugh v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3001751
<i>Shonda G. Chapman v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2617625
<i>Rashaan-Mechelle Elam v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2630795
<i>Mark Forney v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2614957
<i>Brian Heffner v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000471
<i>Kathleen Hicks v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2628778

<i>Evangeline Hoffman-Lorah v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2644957
<i>John Kline v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2621072
<i>Elizabeth Mallin v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2644068
<i>Donna Millan v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2623236
<i>Lori L. Miller v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000685
<i>Richard N. Myers v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2620710
<i>Marlin Peters v. PPL Electric Utilities Corporation</i>	Docket No. F-2017-2612900
<i>Glenda Pink v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2637828
<i>Alan V. Schmukler v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2621285
<i>Willard & Elsbeth Sunstein v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000078
<i>Andrea Torres v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2641883
<i>Debra & Bruce Zimmerman v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2615038
<i>Sharon Landis v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002142
<i>Gail Lund v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002962
<i>Linda E. Beck & Hubert P. Beck v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002924

WHEREFORE, Devin T. Ryan, Movant and Counsel of Record for PPL Electric, respectfully moves for admission of Curtis S. Renner, *pro hac vice*, on behalf of PPL Electric for all permissible purposes in relation to the instant proceeding.

Respectfully submitted,

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
Phone: 610-774-5696
Fax: 610-774-4101
E-mail: kklock@pplweb.com
mjshafer@pplweb.com


Devin T. Ryan (ID # 316602)
Garrett P. Lent (ID # 321566)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dryan@postschell.com
glent@postschell.com

Date: October 31, 2018

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Benhayon,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3003491
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

**VERIFIED STATEMENT OF DEVIN T. RYAN,
SPONSOR OF CURTIS S. RENNER, FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Devin T. Ryan, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 316602), is moving for the admission *pro hac vice* of Curtis S. Renner, Esq. in the above-captioned proceeding. In support of the Motion, I, the sponsor, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I have had sufficient opportunity to conduct a reasonable investigation regarding Mr. Renner and can state that he is a reputable and competent attorney and that I am in a position to recommend Mr. Renner's admission.

2. At this time, I am currently acting as a sponsor of Mr. Renner for admission *pro hac vice* in the following proceedings in the Commonwealth:

<i>Kathleen R. Anthony v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000490
<i>Donna Bervinchak & J. Jude Bervinchak v. PPL Electric Utilities Corporation</i>	Docket Nos. C-2016-2572824 and C-2016-2577527
<i>Michelle Carbaugh v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3001751
<i>Brian Heffner v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000471

<i>Evangeline Hoffman-Lorah v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2644957
<i>John Kline v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2621072
<i>Donna Millan v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2623236
<i>Richard N. Myers v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2620710
<i>Alan V. Schmukler v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2621285
<i>Willard & Elsbeth Sunstein v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000078
<i>Andrea Torres v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2641883
<i>Debra & Bruce Zimmerman v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2615038
<i>Sharon Landis v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002142
<i>Gail Lund v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002962
<i>Linda E. Beck & Hubert P. Beck v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002924

3. I am not currently acting as a sponsor of any other candidate for admission *pro hac vice* in the courts of the Commonwealth.

4. Any proceeds from the settlement of a cause of action in which the candidate 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.

5. I shall remain the attorney of record in this case, as required by the Rules of Civil Procedure.

6. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

7. I previously have sponsored the admission *pro hac vice* of Attorney Renner in the following additional matters before the Commission:

<i>Carolyn & Peter Bamberger v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000358
<i>Shonda G. Chapman v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2617625
<i>Rashaan-Mechelle Elam v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2630795
<i>Mark Forney v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2614957
<i>Kathleen Hicks v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2628778
<i>Elizabeth Mallin v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2644068
<i>Lori L. Miller v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000685
<i>Marlin Peters v. PPL Electric Utilities Corporation</i>	Docket No. F-2017-2612900
<i>Glenda Pink v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2637828

8. At this time, I am sponsoring the admission *pro hac vice* of Attorney Renner in all of the following additional matters before the Commission:

<i>Jonathan Barris v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3003579
<i>Thomas Maslar v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3003075

Respectfully submitted,



Devin T. Ryan (PA ID # 316602)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dryan@postschell.com

Date: October 31, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Benhayon,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3003491
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

**VERIFIED STATEMENT OF CURTIS S. RENNER
FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Devin T. Ryan, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 316602), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of the said sponsor's Motion, I, the candidate, submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I am an attorney and a member in good standing of the Bar of the District of Columbia. I am also admitted to practice before the U.S. District Courts in the District of Columbia and Maryland. I was admitted to the Massachusetts Bar in 1988 (currently inactive) and the Bar of the District of Columbia in 1995. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

2. I am a partner in the Washington, D.C. law firm of Watson & Renner. I have over 30 years of litigation and trial experience before state and federal courts and regulatory agencies. My contact information is as follows:

Curtis S. Renner
Watson & Renner
1901 Pennsylvania Avenue, NW
Suite 1005 – ENS
Washington, DC 20006
(202) 737 6302
crenner@w-r.com

3. I have substantial experience in the public utility law practice area and over the past 30 years I appeared in numerous proceedings before the Pennsylvania Public Utility Commission (“Commission”) and other state utility commissions. I have previously appeared in the following matters before this Commission:

<i>Application of PPL Electric Utilities Corporation Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the Pennsylvania Portion of The Proposed Susquehanna-Roseland 500 kV Transmission Line in Portions of Lackawanna, Luzerne, Monroe, Pike and Wayne Counties, Pennsylvania</i>	Docket Nos. A-2009-2082652, et al
<i>Application Of Pennsylvania Power & Light Company For Approval Of The Proposed Hoffman-Minooka 138/69 kV Supply Line</i>	Docket No. A-110500F0172
<i>Denning v. Pennsylvania Electric Co.</i>	Docket No. C-00003788
<i>Donna Bervinchak & J. Jude Bervinchak v. PPL Electric Utilities Corporation</i>	Docket Nos. C-2016-2572824 and C-2016-2577527
<i>Shonda G. Chapman v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2617625
<i>Rashaan-Mechelle Elam v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2630795
<i>Mark Forney v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2614957
<i>Kathleen Hicks v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2628778
<i>John Kline v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2621072
<i>Donna Millan v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2623236
<i>Richard N. Myers v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2620710
<i>Marlin Peters v. PPL Electric Utilities Corporation</i>	Docket No. F-2017-2612900
<i>Alan V. Schmukler v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2621285
<i>Debra & Bruce Zimmerman v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2615038
<i>Kathleen R. Anthony v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000490

<i>Carolyn & Peter Bamberger v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000358
<i>Brian Heffner v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000471
<i>Evangeline Hoffman-Lorah v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2644957
<i>Elizabeth Mallin v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2644068
<i>Lori L. Miller v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000685
<i>Glenda Pink v. PPL Electric Utilities Corporation</i>	Docket No. C-2017-2637828
<i>Willard & Elsbeth Sunstein v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3000078
<i>Andrea Torres v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-2641883
<i>Sharon Landis v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002142
<i>Gail Lund v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002962
<i>Linda E. Beck & Hubert P. Beck v. PPL Electric Utilities Corporation</i>	Docket No. C-2018-3002924

4. PPL Electric has requested that I appear and assist in the above-captioned proceeding to protect and defend PPL Electric's interests. I am associated with Devin T. Ryan, Esquire, who is a member in good standing of the Pennsylvania Bar and is counsel for PPL Electric in this proceeding.

5. 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.

6. 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 the matter for which admission *pro hac vice* is being sought.

7. I consent to the appointment of the sponsoring attorney, Devin T. Ryan, Esq., 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 matter for which admission *pro hac vice* is sought.

8. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information, and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Respectfully submitted,



Curtis S. Renner (DC ID # 446187)
Watson & Renner
1901 Pennsylvania Avenue, NW
Suite 1005 – ENS
Washington, DC 20006
Phone: 202-737 6302
E-mail: crenner@w-r.com

Dated: October 31, 2018