

October 9, 2019

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

Re: Atuahenes v. PECO and AEP Energy Inc.

Docket No. C-2019-3012904

Dear Secretary Chiavetta:

Enclosed, please find an original copy of a Motion for Admission Pro Hac Vice and Notice of Appearance in the above captioned matter.

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

Sincerely,



**F. Mitchell Dutton
Regulatory Counsel
AEP Energy, Inc.
1 Easton Oval, Suite 200
Columbus, OH 43219
Direct 614-682-4350
Cell 614-499-5700**

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Agnes and Steve Atuahene, Complainant)

Complainants, v.) Docket Number C-2019-3012904
PECO and)
AEP Energy Inc.)
Respondents)

MOTION FOR ADMISSION PRO HAC VICE
AND
NOTICE OF APPEARANCE

Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and Rule 301(b) of the Pennsylvania Bar Admission Rules, David M. Feinberg, General Counsel, American Electric Power, Inc. 1 Riverside Plaza, Columbus OH 43215, respectfully requests the Presiding Administrative Law Judge to enter an Order granting admission pro hac vice to F. Mitchell Dutton as counsel for AEP Energy, Inc. for all purposes in relations to this proceeding.

In support of this Motion, David M. Feinberg avers as follows:

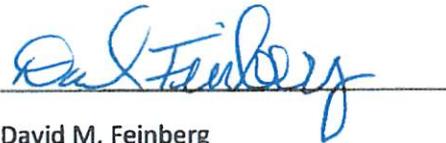
1. I am an active member of the Pennsylvania Bar (Attorney No. 94456).
2. F. Mitchell Dutton is an attorney employed by AEP Energy, Inc. ("AEPE") and is located at 1 Easton Oval, Suite 200; Columbus, OH 43219; Direct 614-682-4350; Cell 614-499-5700.
3. He is a 1981 graduate of the University of Toledo, College of Law. He was admitted to practice law in the State of Ohio in May, 1982 and is currently on active status and is in good standing (Attorney # 0004811). Mr. Dutton has experience with proceedings before state utility commissions in Pennsylvania, Ohio, and Kentucky.
4. Mr. Dutton has never been suspended, disbarred or been the subject of disciplinary proceedings in Ohio, Kentucky, Pennsylvania or any other state.
5. Mr. Dutton has previously sought and was granted permission to appear pro hac vice in a formal customer complaint before the Pennsylvania Public Utility Commission in the matter of Lori Hannon, Complainant v. Penelec and AEP Energy Inc., Docket Number F-2017-2620016 and in the matter of Amanda Klages, Complainant v. AEP Energy, Inc. and West Penn Power Company, Respondents, Complaint Docket No. C-2019-3009612, but AEP Energy and the Complainants reached a mutual agreement or dismissed prior to any appearance in the matter. Mr. Dutton

has not otherwise appeared in any other judicial or administrative proceeding in the state of Pennsylvania.

6. Mr. Dutton agrees to be bound by and comply with applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, the Pennsylvania Rules of Professional Conduct and the Rules of this Commission.
7. Mr. Dutton agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during his appearance in this matter.
8. Mr. Dutton has consented to the appointment of Mr. David M. Feinberg as his sponsor in this matter.

WHEREFORE, David M. Feinberg respectfully moves for the admission of F. Mitchell Dutton to appear in this matter pro hac vice for AEPE for all permissible purposes in relation to this proceeding.

Date: October 9, 2019



David M. Feinberg
Pennsylvania Bar No. 94456
American Electric Power, Inc.
One Riverside Plaza
Columbus, OH 43215

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Complainants, v.) Docket Number C-2019-3012904
PECO and)
AEP Energy Inc.)
Respondents)

VERIFIED STATEMENT OF F. MITCHELL DUTTON
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Pursuant to 52 Pa. Code §§1.22(b) and 5.103 and Pa. Rule of Civil Procedure 1012.1, David M. Feinberg, a member of the bar of the Commonwealth of Pennsylvania (Pa. ID. No. 94456) is moving for my admission pro hac vice in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, F. Mitchell Dutton, submit this verified statement:

1. I am admitted to practice in and am a member in good standing of the bar of Ohio (ID No. 0004811), having been admitted in 1982. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.
2. I sought and was granted permission to appear pro hac vice in a formal customer complaint before the Pennsylvania Public Utility Commission in the matter of Lori Hannon, Complainant v. Penelec and AEP Energy Inc., Docket Number F-2017-2620016 and in the matter of Amanda Klages, Complainant v. AEP Energy, Inc. and West Penn Power Company, Respondents, Complaint Docket No. C-2019-3009612, but AEP Energy and the Complainants reached a mutual agreement of dismissed prior to appearing in the matter. I have not otherwise appeared any other judicial or administrative proceeding in the state of Pennsylvania.
3. 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.
4. 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 matter for which admission pro hac vice is being sought.
5. I consent to the appointment of the sponsoring attorney, David M. Feinberg, 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.

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.
7. I understand that the statements are made subject to the penalties of 18 Pa. C.S. §4904 (relating to falsifications to authorities).



F. Mitchell Dutton
Regulatory Counsel
AEP Energy, Inc.
1 Easton Oval, Suite 200
Columbus, OH 43219
Direct 614-682-4350
Cell 614-499-5700

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PECO and)

AEP Energy Inc.)

Respondents)

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

I, David M. Feinberg, state the following:

1. After reasonable investigation, I reasonably believe that F. Mitchell Dutton is a responsible and competent attorney. Accordingly, I am in a position to recommend his admission pro hac vice in the above-captioned matter.
2. Any proceeds from the settlement of a cause of action in which the candidates are 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.
4. I shall remain the attorney of record for this case, as required by the Rules of Civil Procedure.
5. 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).

Date: October 9, 2019



David M. Feinberg
Pennsylvania Bar No. 94456
General Counsel
American Electric Power, Inc.
Columbus, OH 43215

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Complainants, v.)

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NOTICE OF APPEARANCE

Please enter the appearance of F. Mitchell Dutton (pursuant to a pending motion for pro hac vice admission) and David M. Feinberg as counsel for AEP Energy, Inc. in the above entitled proceeding. F. Mitchell Dutton is authorized to accept service for AEP Energy, Inc. in this matter. On the basis of this Notice, F. Mitchell Dutton requests a copy of each document issued hereafter by the Commission or the party[ies] in this proceeding to be served on him.

Respectfully submitted,



F. Mitchell Dutton
Regulatory Counsel
AEP Energy, Inc.
1 Easton Oval, Suite 200
Columbus, OH 43219
Direct 614-682-4350
Cell 614-499-5700



David M. Feinberg
Pennsylvania Bar No. 94456
General Counsel
American Electric Power, Inc.
One Riverside Plaza
Columbus, OH 43215

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), via email and first class mail, upon the persons listed below:

Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120
Attn: Rosemary Chiavetta, Secretary

Agnes & Steve Atuahene
7500 North 17th Street
Philadelphia, PA 19138
Phone: 267-335-3135
Email: fas098@yahoo.com
Utility Account No. 07200-37070

Shawane Lee
PECO
2301 Market Street S23-1
Philadelphia, PA 19103

This 9th day of October 2019.

Respectfully Submitted,



F. Mitchell Dutton
Regulatory Counsel
AEP Energy, Inc.
1 Easton Oval, Suite 200
Columbus, OH 43219
Direct 614-682-4350
Cell 614-499-5700