

Tori L. Giesler, Esq.
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(330) 315-9263 (Fax)

December 10, 2019

VIA ELECTRONIC FILING

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

Re: Eugene J. Bazan v. West Penn Power Company
Docket No. C-2017-2640338

Dear Secretary Chiavetta:

Enclosed please find the Motion of West Penn Power Company for admission of counsel Pro Hac Vice with regard to the above-captioned matter. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Tori L. Giesler

kbw
Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EUGENE J. BAZAN	:	
	:	
v.	:	Docket No. C-2017-2640338
	:	
WEST PENN POWER COMPANY	:	

**MOTION OF WEST PENN POWER COMPANY
FOR ADMISSION OF COUNSEL *PRO HAC VICE***

TO ADMINISTRATIVE LAW JUDGE JEFFREY A. WATSON:

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 West Penn Power Company (“WPP” or the “Company”), Tori L. Giesler, respectfully requests that Your Honor enter an Order granting admission *pro hac vice* to Thomas Carl Watson, as counsel for WPP for all purposes in relation to the above-captioned proceeding (“Motion”). In support thereof, the Movant, Tori L. Giesler, 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 her appearance as counsel of record for WPP in this proceeding, is an active member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 207742), and is litigation counsel with WPP’s parent company, FirstEnergy Service Company, with offices in Reading, Pennsylvania.

2. Mr. Watson is a Partner in the Washington, D.C. law firm of Watson & Renner at 1901 Pennsylvania Avenue, NW, Suite 1005-ENS, Washington, DC 20006. The Verified Statement of Thomas Carl Watson for Admission Pro Hac Vice was filed with this motion.

3. Mr. Watson is a 1972 graduate of Washington University Law School. He was admitted to the Missouri Bar in 1972 (currently inactive) and has been a member in good standing of the Bar of the District of Columbia since 1973. He also is admitted to practice before the U.S. District Court for the District of Columbia and the Supreme Court of the United States and other U.S. courts.

4. Mr. Watson has experience and particular expertise in various aspects of regulatory and public utility law, including that related to smart meters, and has previously appeared in proceedings before the Pennsylvania Public Utility Commission and other state utility commissions.

WHEREFORE, Tori L. Giesler, Movant and Counsel of Record for WPP, respectfully moves for admission of Thomas Carl Watson, *pro hac vice*, on behalf of WPP for all permissible purposes in relation to the instant proceeding.

Respectfully submitted,



Tori L. Giesler (ID # 207742)
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
Phone: 610-921-6658
Fax: 330-315-9263
E-mail: tgiesler@firstenergycorp.com

Date: December 10, 2019

Attorney for West Penn Power Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EUGENE J. BAZAN

:

v.

:

Docket No. C-2017-2640338

:

WEST PENN POWER COMPANY

:

**VERIFIED STATEMENT OF TORI L. GIESLER
SPONSOR OF THOMAS CARL WATSON, 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, Tori L. Giesler, a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. No. 207742), is moving for the admission *pro hac vice* of Thomas Carl Watson 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. Watson and can state that he is a reputable and competent attorney and that I am in a position to recommend Mr. Watson's admission.

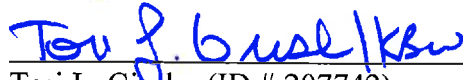
2. At this time, I am not currently acting as a sponsor of Mr. Watson or any other candidate for admission *pro hac vice* in the courts of the Commonwealth:

3. 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.

4. I shall remain the attorney of record in 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).

Respectfully submitted,



Tori L. Giesler (ID # 207742)

FirstEnergy Service Company

2800 Pottsville Pike

P.O. Box 16001

Reading, Pennsylvania 19612-6001

Phone: 610-921-6658

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E-mail: tgiesler@firstenergycorp.com

Date: December 10, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EUGENE J. BAZAN	:	
	:	
V.	:	C-2017-2640338
	:	
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Verified Statement of Thomas Carl Watson for Admission *Pro Hac Vice*

1. My name is Thomas Carl Watson. I am licensed to practice law in the District of Columbia, and have been since 1973, and my bar license number is 180943. I am also licensed to practice law in the State of Missouri Bar, and my bar license number is 24332 (I am currently an inactive member of the Missouri Bar).
2. I have never been suspended, disbarred or otherwise disciplined by any jurisdiction in which I hold or have held a license to practice law.
3. I have never been the subject of disciplinary proceedings in any jurisdiction.
4. I have applied for admission *pro hac vice* in two pending actions in Pennsylvania, both before the Pennsylvania Public Utility Commission (Caesar v. PECO, C-2017-2605462, and Mendez-Quigley v. PECO, C-2017-2617558) and in neither of those actions was the motion been denied. I have previously been admitted *pro hac vice* in other actions before the Pennsylvania Public Utility Commission and will provide a list of those cases if requested.
5. In my representation before the Pennsylvania Public Utility Commission, I will 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 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 sought.

7. I consent to the appointment of my sponsor (Tori Giesler) 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.

I, Thomas Carl Watson, hereby state that the facts set forth above are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Signature:  _____

Date: December 10, 2019

Thomas Carl Watson
Watson & Renner
1901 Pennsylvania Avenue, NW, Suite 1005-ENS
Washington, DC 20006
202 258 6577
tw@w-r.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EUGENE J. BAZAN

v.

WEST PENN POWER COMPANY

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Docket No. C-2017-2640338

CERTIFICATE OF SERVICE

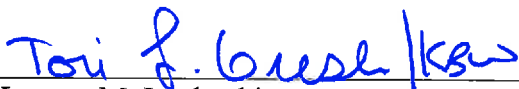
I hereby certify that I have this day served a true copy of the Motion of West Penn Power Company for admission of counsel Pro Hac Vice upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic and First Class Mail, postage prepaid, as follows:

Eugene J. Bazan
P.O. Box 24
Lemont, PA 16851
genebazan@aol.com

Administrative Law Judge Jeffrey A. Watson
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222
jeffwatson@pa.gov

Dated: December 10, 2019



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