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February 2, 2022

VIA ELECTRONIC FILING

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

**RE: JOINT PETITION OF METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY,
AND WEST PENN POWER COMPANY, FOR APPROVAL OF THEIR DEFAULT
SERVICE PROGRAMS**

Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, P-2021-3030021

Dear Secretary Chiavetta:

Enclosed for filing please find a Motion for the Admission of Brian Greene *Pro Hac Vice* on behalf of Enerwise Global Technologies, LLC d/b/a CPower Energy Management, in the above-captioned matter. A copy has been served in accordance with the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Administrative Law Judge Jeffrey A. Watson (via Email)
Certificate of Service

Allentown • Bergen County • Bala Cynwyd • Cleveland • Fort Lauderdale • Harrisburg • Lancaster • New York
Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington
A PROFESSIONAL CORPORATION

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition Of Metropolitan Edison Company,	:	P-2021-3030012
Pennsylvania Electric Company, Pennsylvania	:	P-2021-3030013
Power Company And West Penn Power Company	:	P-2021-3030014
For Approval Of Their Default Service Programs	:	P-2021-3030021
	:	

**MOTION FOR ADMISSION *PRO HAC VICE* OF BRIAN R. GREENE
ON BEHALF OF
ENERWISE GLOBAL TECHNOLOGIES LLC
d/b/a CPOWER ENERGY MANAGEMENT**

Pursuant to 52 Pa. Code §1.22(b) and the Pennsylvania Bar Admission Rules, 204 Pa. Code Rule 301, Michael A. Gruin,, an active member and a member in good standing of the bar of this Commonwealth (Attorney I.D. No. 78625), hereby moves that Brian R. Greene be admitted to appear *pro hac vice* and practice before the Pennsylvania Public Utility Commission as counsel for Enerwise Global Technologies LLC d/b/a CPower Energy Management, in the above-captioned matter. The Verified Statement of Brian R. Greene is attached hereto as Exhibit “A” and relied upon in support of this Motion.

I certify that copies of this Motion and attached Verified Statement has been served on all parties of record in the above-captioned matter.

Respectfully submitted,



Dated: February 1, 2022

Michael A. Gruin, (I.D. No. 78625)
STEVENS & LEE
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101
Tel. (717) 255-7365
Fax (610) 988-0852
Attorney for Enerwise Global Technologies LLC
d/b/a CPower Energy Management

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition Of Metropolitan Edison Company,	:	P-2021-3030012
Pennsylvania Electric Company, Pennsylvania	:	P-2021-3030013
Power Company And West Penn Power Company	:	P-2021-3030014
For Approval Of Their Default Service Programs	:	P-2021-3030021
	:	

VERIFIED STATEMENT OF BRIAN R. GREENE

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and 1012.1, Michael A. Gruin, Esquire, a member of the Bar of the Commonwealth of Pennsylvania (Attorney I.D. No. 78625), moves for my admission *pro hac vice* in the above-captioned proceedings. In support of Mr. Gruin’s Sponsor Motion and pursuant to Pa. B.A.R. 1012.1, I, Brian R. Greene, candidate, submit this verification and hereby state as follows:

1. I am a member in good standing of the State Bars of the Commonwealth of Virginia (Bar No. 38215), the District of Columbia (Bar No. 450954), and the State of Maryland (Attorney Number 9512120319).¹

2. I am an experienced litigator with extensive knowledge of issues related to electric generation and natural gas suppliers.

3. I practice with the law firm of GreeneHurlocker, PLC in Richmond, Virginia.

4. I have not been denied admission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice, nor do I currently have, nor have I ever had, any disciplinary proceedings pending against me in

¹ Maryland does not assign bar numbers to Maryland lawyers. Each Maryland lawyer must register with the Attorney Information System (“AIS”) and receives an Attorney Number.

any Federal or State Court or Administrative Agency, nor have I ever been reprimanded, suspended, or disbarred from the practice of law. I have no pending disciplinary complaints as to which a finding has been made that the complaint should proceed to a hearing.

5. I have previously been admitted *pro hac vice* in seven matters before the Pennsylvania Public Utility Commission. Three of those matters involved PECO Energy Company, and the docket numbers were: P-2008-2062739, P-2008-2062740, and P-2008-2062741. Four other matters were prior default service proceedings involving Duquesne Light Company, docket numbers P-2009-2135500, P-2012-2301664, P-2014-2418242, and P-2016-2543140.

6. I will comply with and be bound by all applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct, and I will submit to the jurisdiction of the Commonwealth of Pennsylvania courts, administrative agencies and the Disciplinary Board with respect to the acts and omissions occurring during the appearance in the matter for which *pro hac vice* is being sought.

7. I consent to the appointment of Michael A. Gruin, and the law firm of Stevens & Lee 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 matters for which admission *pro hac vice* is sought.

8. If there should be any proceeds from the settlement of this proceeding in which I am admitted *pro hac vice*, they shall be received, held, and distributed and accounted for in

accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

9. In support of this motion, Michael A. Gruin, Esq., attaches a Verification labelled as Exhibit B, which satisfies the requirements of the foregoing Rule of Civil Procedure.

10. I verify that the foregoing statement is true to the best of my knowledge, information and belief. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

WHEREFORE, I respectfully request admission as counsel for Enerwise Global Technologies LLC d/b/a CPower Energy Management in the above captioned action.

Respectfully submitted,

Dated: February 1, 2022

/s/ Brian R. Greene
Brian R. Greene
Virginia State Bar No. 38215
District of Columbia Bar No. 450954
State of Maryland AIS No. 9512120319
GREENEHURLOCKER, PLC
4908 Monument Avenue, Suite 200
Richmond, Virginia 23230
Tel: 804.672.4542
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BGreene@GreeneHhurlocker.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition Of Metropolitan Edison Company,	:	P-2021-3030012
Pennsylvania Electric Company, Pennsylvania	:	P-2021-3030013
Power Company And West Penn Power Company	:	P-2021-3030014
For Approval Of Their Default Service Programs	:	P-2021-3030021
	:	

VERIFIED STATEMENT OF MICHAEL A. GRUIN

I, Michael A. Gruin, hereby state as follows:

1. I am counsel for Enerwise Global Technologies LLC d/b/a CPower Energy Management in the above-captioned matters currently pending before the Pennsylvania Public Utility Commission in the Commonwealth of Pennsylvania.

2. I am admitted to practice law in the Commonwealth of Pennsylvania and am a member in good standing holding Bar No. 78625. I have never been suspended, disbarred, or disciplined by a court or administrative agency, nor am I subject to any proceeding for suspension, disbarment, or disciplinary action.

3. I regularly practice before the Pennsylvania Public Utility Commission.

2. Brian R. Greene is an attorney duly licensed in the Commonwealth of Virginia (Bar No. 38215), in the District of Columbia (Bar No. 450954), and in the State of Maryland (Attorney Information System No. 9512120319).² Mr. Greene’s address, telephone number, fax number, and email address are as follows:

Brian R. Greene
GREENEHURLOCKER, PLC
4908 Monument Avenue
Suite 200
Richmond, Virginia 23230

² Maryland does not assign bar numbers to Maryland lawyers. Each Maryland lawyer must register with the Attorney Information System (“AIS”) and receives an Attorney Number.

Tel: 804.672.4542
Fax: 804.672.4540
BGreene@GreeneHurlocker.com

3. Mr. Greene is not now, and has never been, under any order of discipline by any disciplinary board and presently is a member of good standing of the Bars of the Commonwealth of Virginia, the District of Columbia, and the State of Maryland.

4. Mr. Greene is of good moral and professional character and, if required, will swear and affirm that he will demean himself as an attorney and counselor of this Court, uprightly and according to the law, and that he will support the Constitution of the United States.

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

6. The proceeds from the settlement of a cause of action in which Mr. Greene is admitted *pro hac vice* shall be received, held, and 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, it is respectfully requested that Brian R. Greene be permitted to practice *pro hac vice* before the Pennsylvania Public Utility Commission in this proceeding.

Respectfully submitted,



Dated: February 2, 2022

Michael A. Gruin, (I.D. No. 78625)
STEVENS & LEE
17 N. 2nd St., 16th Fl.
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Tel. (717) 255-7365
Fax (610) 988-0852
Attorney for Enerwise Global Technologies LLC
d/b/a CPower Energy Management

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition Of Metropolitan Edison Company,	:	P-2021-3030012
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For Approval Of Their Default Service Programs	:	P-2021-3030021
	:	

**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF BRIAN R. GREENE**

Upon consideration of the Motion for Admission *Pro Hac Vice* of Brian R. Greene, it is
this ____ day of February, 2022,

ORDERED, that the Motion is hereby GRANTED, and it is further

ORDERED, that Brian R. Greene is admitted *pro hac vice* for the purposes of
representing Enerwise Global Technologies LLC d/b/a CPower Energy Management
in the above-captioned proceedings.

Honorable Jeffrey A. Watson
Administrative Law Judge

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition Of Metropolitan Edison Company,	:	P-2021-3030012
Pennsylvania Electric Company, Pennsylvania	:	P-2021-3030013
Power Company And West Penn Power Company	:	P-2021-3030014
For Approval Of Their Default Service Programs	:	P-2021-3030021
	:	

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of February, 2022, a copy of the foregoing Motion for Admission *Pro Hac Vice* of Brian R. Greene on Behalf of Enerwise Global Technologies LLC d/b/a CPower Energy Management has been served, via electronic mail, upon the persons listed below, in accordance with the Requirements of 52 Pa. Code § 1.54:

THE HONORABLE JEFFREY A.
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Michael A. Gruin

DATED: February 2, 2022