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OF COUNSEL

May 6, 2024

LEONARD SPEAR  
1923 - 2003

LOUIS H. WILDERMAN  
1909 - 1993

PA BAR EXCEPT  
† NJ BAR  
\* PA & NJ BAR  
◇ PA, NJ & DC BAR  
\*\* PA, NJ & NY BAR  
◇◇PA, NJ & MD BAR

**VIA ELECTRONIC FILING**

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

**RE: Pennsylvania Public Utility Commission v. PECO Energy Company- Electric  
Division  
Docket No. R-2024-3046931  
Internal File No. 1974-005**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced proceeding, please find the Motion for Admission *Pro Hac Vice* of Nicholas J. Enoch. All parties are asked to include Mr. Enoch on their e-service list, at [nick@lubinandenoch.com](mailto:nick@lubinandenoch.com). As evidenced by the attached Certificate of Service, all parties to this proceeding are being served with a copy of this document. Should you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,  
  
for CJ

Charles T. Joyce, Esq.  
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230 South Broad Street, Suite 1650  
Philadelphia, PA 19102  
Phone: 215-732-0101  
[CTJoyce@spearwilderman.com](mailto:CTJoyce@spearwilderman.com)

Sponsoring Attorney

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION

Docket No. R-2024-3046931

v.

PECO ENERGY COMPANY- ELECTRIC  
DIVISION

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**MOTION FOR ADMISSION *PRO HAC VICE***

Charles T. Joyce, Esq.  
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*Counsel for Intervenor-Applicant  
IBEW Local 614*

Dated: May 6, 2024.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION

Docket No. R-2024-3046931

v.

PECO ENERGY COMPANY- ELECTRIC  
COMPANY

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**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and Pa. R.C.P. No. 1012.1, Charles T. Joyce, Esq. (“Sponsor”) moves for the admission *pro hac vice* of Nicholas J. Enoch, Esq. (the “Candidate”) to appear on behalf of Local 614 of the International Brotherhood of Electrical Workers, AFL-CIO (“IBEW Local 614”) in the above-captioned proceeding of the Pennsylvania Public Utility Commission (the “Commission”).

1. Pursuant to 231 Pa. Code. § 1012.1(b)(2), a Verified Statement of Charles T. Joyce, Esq. is attached hereto as **Exhibit A**; a Verified Statement of Nicholas J. Enoch, Esq. is attached hereto as **Exhibit B**.

2. Sponsor is a member in good standing of the bar of the Commonwealth of Pennsylvania and has never been suspended, disbarred, or otherwise disciplined by a court or administrative body. Sponsor has entered an appearance in the above-captioned proceeding on behalf of IBEW Local 614 and shall remain attorney of record.

3. Nicholas J. Enoch, Esq. is a member in good standing of the bars of Arizona, Colorado, and Texas, and has never been suspended, disbarred, or otherwise disciplined by any court or administrative body.

4. *Pro hac vice* appearance before the Commission is the equivalent of appearance before a special court as defined in 204 Pa. Code § 81.501(g). As such, the Candidate’s appearances in this

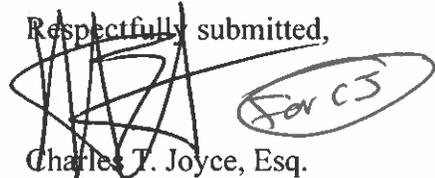
proceeding *pro hac vice* does not require the payment of any fee to the Pennsylvania Interest on Lawyers' Trust Accounts Board ("IOLTA Board") under 204 Pa. Code § 81.505(c) or the filing of an informational form with the IOLTA Board under 204 Pa. Code § 81.503(c) and 204 Pa. Code § 81.504. 5.

5. The Candidate has experience in matters relating to ratemaking by public utilities, and IBEW Local 614 has requested that the Candidate be admitted to represent it in this proceeding.

WHEREFORE, the undersigned Sponsor respectfully moves that the Candidate be admitted to appear *pro hac vice* on behalf of IBEW Local 614 in this proceeding.

Dated: May 6, 2024.

Respectfully submitted,

A handwritten signature in black ink, which appears to be "Charles T. Joyce", is written over the typed name. To the right of the signature, the words "For CS" are written in a circle.

Charles T. Joyce, Esq.

Attorney ID: 51254

Spear Wilderman, P.C.

230 South Broad Street, Suite 1650

Philadelphia, PA 19102

Phone: 215-732-0101

[CTJoyce@spearwilderman.com](mailto:CTJoyce@spearwilderman.com)

*Counsel for Intervenor-Applicant*

*IBEW Local 614*

**EXHIBIT A**  
VERIFIED STATEMENT OF CHARLES T. JOYCE, ESQ.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION

Docket No. R-2024-3046931

v.

PECO ENERGY COMPANY- ELECTRIC  
DIVISION

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**VERIFIED STATEMENT OF CHARLES T. JOYCE**

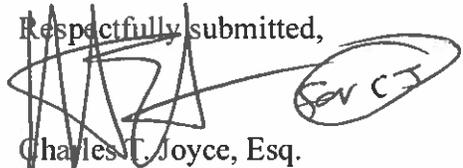
I, Charles T. Joyce, hereby state as follows:

1. I am an attorney at Spear Wilderman, P.C. in the Commonwealth of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania (PA ID 51254) and am in good standing with all courts and administrative agencies of the Commonwealth.
3. 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.
4. I am currently acting as sponsor for one (1) candidate for admission *pro hac vice* in the above-captioned proceeding of the Commission. Otherwise, I am not currently acting as a sponsor in any other cases in any court of record in the Commonwealth.
5. After reasonable investigation, I believe Nicholas J. Enoch, Esq. to be a reputable and competent attorney.
6. I am in a position to recommend the admission *pro hac vice* of Nicholas J. Enoch, Esq.
7. If there should be any proceeds from the settlement of this proceeding, such proceeds 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, if applicable.

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

Dated: May 6, 2024.

Respectfully submitted,



Charles T. Joyce, Esq.  
Attorney ID: 51254  
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*Counsel for Intervenor-Applicant  
IBEW Local 614*

**EXHIBIT B**

VERIFIED STATEMENT OF NICHOLAS J. ENOCH, ESQ.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY  
COMMISSION

Docket No. R-2024-3046931

v.

PECO ENERGY COMPANY- ELECTRIC  
DIVISION

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and 231 Pa. Code 1012.1(c), Charles T. Joyce, Esq. (“Sponsor”), a member of the bar of the Commonwealth of Pennsylvania (PA ID 51254), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of Sponsor’s motion, I, Nicholas J. Enoch, state as follows:

1. I am the president of Lubin & Enoch, P.C., a private law firm.
2. I am admitted to practice in the courts of Arizona (State Bar No. 016473), Colorado (State Bar No. 27113), and Texas (State Bar No. 24042618). I am in good standing in these jurisdictions. I have never been suspended, disbarred, disciplined, or otherwise subject to any disciplinary proceeding in any jurisdiction.
3. Since 2000, I have represented various labor organizations - mostly IBEW local unions - in rate setting, and various other public utility regulatory, proceedings in Arizona, Colorado, Delaware, Maryland, Texas and before the Federal Energy Regulatory Commission. And in November 2009, I taught a continuing legal education class at the IBEW Lawyers’ Conference on “Representing IBEW Locals Before State Public Utility Commissions: A Labor Lawyer’s Guide to Doing a Rate Hearing.”

4. I have not applied for admission *pro hac vice* in any other pending action in any court of record in Pennsylvania.

5. I have never had an application for admission *pro hac vice* denied in any court of record in Pennsylvania.

6. If granted *pro hac vice* admission, 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.

7. If granted *pro hac vice* admission, 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.

8. If granted *pro hac vice* admission, I consent to the appointment of the sponsor 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.

Dated: May 6, 2024

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nicholas J. Enoch', with a long horizontal flourish extending to the right.

Nicholas J. Enoch, Esq.  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding, via email, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

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Jennedy S. Johnson  
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/s/ Morgan L. Bigelow