



July 31, 2024

**VIA E-MAIL AND E-FILING**

**William Lesser**

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Honorable Marta Guhl  
Honorable Darlene Heep  
Administrative Law Judges  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
dheep@pa.gov; mguhl@pa.gov

**Re: *Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Div.***

**Motion for Admission *Pro Hac Vice* of Stephen Bright, Esq. on behalf of Electrify America, LLC, Docket No. R-2024-3046931**

Dear Administrative Law Judges Guhl and Heep,

Enclosed for filing in the above-referenced proceeding is the Motion for Admission *Pro Hac Vice* of Stephen Bright, Esq., on behalf of Intervenor Electrify America, LLC (“Motion”). Stephen Bright, Esq. has been involved in this proceeding with the undersigned Sponsor of this Motion, and Mr. Bright is already on the official service list for this matter. Electrify America, LLC respectfully requests Your Honors grant this Motion in advance of the scheduled evidentiary hearings for this proceeding.

This document was filed electronically with the Commission on this date. Copies of this document have been served on this date to the parties to this proceeding in accordance with the attached Certificate of Service. Please direct any questions concerning this filing to me. Thank you for your attention to this matter.

Respectfully submitted,

COZEN O'CONNOR

By: William Lesser (PA I.D. No. 332951)  
*Counsel for Electrify America, LLC*

WL  
Enclosures

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket No. R-2024-3046931</b>
	:	
<b>PECO Energy Company – Electric Division</b>	:	

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

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Pursuant to 52 Pa. Code § 1.22(b), Pa. B.A.R. 301 (b), and Pa. R.C.P. No. 1012.1, William Lesser, Esq. (“Sponsor”) moves for the admission *pro hac vice* of Stephen Bright, Esq. (the “Candidate”) to appear on behalf of Electrify America, LLC (“Electrify America”) in the above-referenced proceeding. In support of this motion, Candidate and Sponsor hereby state the following:

1. Pursuant to 231 Pa. Code § 1012.1(b)(2), a Verified Statement of William Lesser, Esq. is attached hereto, as is a Verified Statement of Stephen Bright, Esq.
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 Electrify America and shall remain attorney of record.
3. Stephen Bright, Esq. is a member of good standing of the bars of Massachusetts, Connecticut, and is a registered Corporate Counsel in Virginia, 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

appearance 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. The Candidate has experience in matters relating to ratemaking by public utilities, as well as the procedures of regulatory proceedings before public utility commissions, and Electrify America, LLC 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 Electrify America, LLC in this proceeding.

Respectfully Submitted,



William Lesser, Esq.  
(PA I.D. No. 332951)  
*Counsel for Electrify America, LLC*  
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Dated : July 31, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket No. R-2024-3046931</b>
	:	
<b>PECO Energy Company – Electric Division</b>	:	

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**VERIFIED STATEMENT OF WILLIAM LESSER, ESQ.**

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I, William Lesser, hereby state as follows:

1. I am an attorney at Cozen O’Connor in the Commonwealth of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania (PA ID 332951) 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, Stephen Bright, Esq., 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 Stephen Bright, Esq. to be a reputable and competent attorney and I am in a position to recommend the candidate’s admission.
6. 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 thereof, if applicable.

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

Respectfully Submitted,



William Lesser, Esq.  
(PA I.D. No. 332951)  
*Counsel for Electrify America, LLC*  
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Dated: July 31, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket No. R-2024-3046931</b>
	:	
<b>PECO Energy Company – Electric Division</b>	:	

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**VERIFIED STATEMENT OF STEPHEN BRIGHT, ESQ.**

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Pursuant to 52 Pa. Code § 1.22(b), Pa. B.A.R. 301(b), and 231 Pa. Code 1012.1(c), William Lesser, Esq. (“Sponsor”), a member of the bar of the Commonwealth of Pennsylvania (PA ID 332951), is moving for my admission pro hac vice in the above-captioned proceeding. In support of Sponsor's motion, I, Stephen Bright, Esq., state as follows:

1. I am a Senior Counsel at Electrify America, LLC.
2. I am admitted to practice law in the Commonwealth of Massachusetts (Board of Bar Overseers #681596), the state of Connecticut (Juris Number 441721) and I am registered in the Commonwealth of Virginia as a Corporate Counsel (VSB ID #99897). I am in good standing in these jurisdictions, and I have never been suspended, disbarred, or disciplined by a court or administrative agency in any of these jurisdictions, nor am I subject to any proceeding for suspension, disbarment, or disciplinary action at this time.
3. I have not applied for admission *pro hac vice* in any other pending action in any court of Pennsylvania prior to this motion, and as such I have never been denied admission.
4. 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.

5. If granted *pro hac vice* admission in this proceeding, I 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.

6. If granted *pro hac vice* admission in this proceeding, I consent to the appointment of 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.

Respectfully submitted,



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Stephen Bright, Esq.  
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**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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**CERTIFICATE OF SERVICE**

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I hereby certify and affirm that I have this day served a copy of the foregoing documents on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

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Dated: July 31, 2024