

# Morgan Lewis

**Kenneth M. Kulak**

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November 22, 2024

**VIA eFILING**

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

**Re: Application of PECO Energy Company Filed Pursuant to 52 Pa. Code §§ 57.71 *et seq.* for Approval of the Siting and Construction of the PJM 2022 Reliability Window #3 Project Located in Peach Bottom Township, York County, Pennsylvania, and Petition for Waiver of 52 Pa. Code § 57.72 (c)(10)  
Docket No. A-2024-3051463**

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Dear Secretary Chiavetta:

On behalf of PECO Energy Company, enclosed for filing in the above-referenced matter is a Motion for Admission Pro Hac Vice of J. Daniel Skees.

If you have any questions pertaining to this matter, please do not hesitate to contact me directly at 215.963.5384.

Very truly yours,



Kenneth M. Kulak

KMK/nt  
Enclosures

c: Per Certificate of Service (w/encls.)

DB1/ 153420890.1

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company Filed Pursuant to 52 Pa. Code §§ 57.71 et seq. for Approval of the Siting and Construction of the PJM 2022 Reliability Window #3 Project Located in Peach Bottom Township, York County, Pennsylvania, and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)**

**Docket No. A-2024-3051463**

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**MOTION FOR ADMISSION PRO HAC VICE**

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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, I, Kenneth M. Kulak, Esq., as counsel to PECO Energy Company (“PECO”) respectfully request that Your Honor enter an Order granting admission *pro hac vice* to J. Daniel Skees, as counsel to PECO, for all purposes related to the above-referenced proceeding. In support of this Motion, I, Kenneth M. Kulak, Esq. hereby state as follows:

1. Pursuant to Section 1.24(b)(1) of the Commission’s regulations, 52 Pa. Code § 1.24(b)(1), I have entered my appearance as counsel for PECO in this proceeding, and am an active member, in good standing, of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. 75509).

2. Mr. Skees is a licensed attorney in good standing in the District of Columbia (D.C. I.D. 983893) and Virginia (VA I.D. 75434). Mr. Skees has never been suspended, disbarred, or resigned because of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.

3. If granted *pro hac vice* admission, Mr. Skees 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. Mr. Skees also 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.

4. Mr. Skees has consented to the appointment of Kenneth M. Kulak, Esq. as his sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record in this case on behalf of PECO, as required by the Pennsylvania Rules of Civil Procedure.

5. Mr. Skees has experience in matters relating to the transmission of electricity by public utilities, and PECO has requested that he be admitted to represent PECO in this proceeding.

6. Mr. Kulak and Mr. Skees have attached their Verified Statements for Admission *Pro Hac Vice* to this Motion.

WHEREFORE, I, Kenneth M. Kulak, Esq., respectfully move for the admission of J. Daniel Skees, Esq. *pro hac vice*, on behalf of PECO for all permissible purposes related to the above-referenced proceeding.

Respectfully submitted,



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*Counsel for PECO Energy Company*

November 22, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company Filed Pursuant to 52 Pa. Code §§ 57.71 et seq. for Approval of the Siting and Construction of the PJM 2022 Reliability Window # 3 Project Located in Peach Bottom Township, York County, Pennsylvania, and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)**

**Docket No. A-2024-3051463**

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**VERIFIED STATEMENT OF KENNETH M. KULAK**

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Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Kenneth M. Kulak, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. 75509), is moving for admission *pro hac vice* in the above-captioned proceeding. In support of the Motion, I submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I am admitted to practice in, and am a member in good standing of, the Bar of the Commonwealth of Pennsylvania (Pa. I.D. 75509).

2. I have never been suspended, disbarred, or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.

3. I am currently acting as a sponsor for the admission *pro hac vice* of Mr. J. Daniel Skees in the above captioned proceeding before the Pennsylvania Public Utility Commission. I am also acting as a sponsor by separate motion for Mr. Skees in *Application of PECO Energy Company Filed Pursuant to 52 Pa. Code §§ 57.71 et seq. for Approval of the Siting and Construction of the Brandon Shores Retirement Mitigation Project Located in Peach Bottom Township, York County, Pennsylvania and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)*, Docket No. A-2024-3051467, before the Pennsylvania Public Utility Commission. In addition, by

separate motions, I am acting as sponsor for the admission *pro hac vice* of Mr. Robert Goldfin in the same two proceedings.

4. 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.

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 these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,



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November 22, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company Filed Pursuant to 52 Pa. Code §§ 57.71 et seq. for Approval of the Siting and Construction of the PJM 2022 Reliability Window # 3 Project Located in Peach Bottom Township, York County, Pennsylvania, and Petition for Waiver of 52 Pa. Code § 57.72(c)(10)**

**Docket No. A-2024-3051463**

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**VERIFIED STATEMENT OF J. DANIEL SKEES**

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Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Kenneth M. Kulak, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. 75509), is moving for admission *pro hac vice* in the above-captioned proceeding. In support of the Motion, I submit this verified statement pursuant to Pa. R.C.P. 1012.1:

1. I am admitted to practice in, and am a member in good standing of, the Bar of the District of Columbia (DC I.D. 983893) and Virginia (VA I.D. 75434).

2. I have never been suspended, disbarred, or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.

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, Kenneth M. Kulak, Esq., 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. I understand that these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,



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November 22, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of PECO Energy Company** :  
**Filed Pursuant to 52 Pa. Code §§ 57.71 et** :  
**seq. for Approval of the Siting and** :  
**Construction of the PJM 2022 Reliability** : **DOCKET NO. A-2024-3051463**  
**Window #3 Project Located in Peach** :  
**Bottom Township, York County,** :  
**Pennsylvania, and Petition for Waiver of** :  
**52 Pa. Code § 57.72 (c)(10)** :

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the **Motion for Admission Pro Hac Vice of J. Daniel Skees** on behalf of PECO Energy Company on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL**

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Dated: November 22, 2024