

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

Ken.kulak@morganlewis.com

November 22, 2024

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd 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**

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 Robert P. Goldfin.

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/ 153420902.1

Morgan, Lewis & Bockius LLP

2222 Market Street
Philadelphia, PA 19103-2921
United States

T +1.215.963.5000
F +1.215.963.5001

**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

MOTION FOR ADMISSION PRO HAC VICE

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 Robert P. Goldfin, 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. Goldfin is a licensed attorney in good standing in the District of Columbia (DC I.D. 1044968) and New York (NY I.D. 5579701). Mr. Goldfin 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. Goldfin 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.

4. Mr. Goldfin 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.

5. Mr. Goldfin 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.

6. Mr. Goldfin 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.

7. Mr. Kulak and Mr. Goldfin 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 Robert P. Goldfin, Esq. *pro hac vice*, on behalf of PECO for all permissible purposes related to the above-referenced proceeding.

Respectfully submitted,



Kenneth M. Kulak (Pa. No. 75509)
Morgan, Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103-3007
Ph: 215.963.5384
Fax: 215.963.5001
Email: ken.kulak@morganlewis.com

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

VERIFIED STATEMENT OF KENNETH M. KULAK

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. Robert P. Goldfin in the above captioned proceeding before the Pennsylvania Public Utility Commission. I am also acting as a sponsor by separate motion for Mr. Goldfin 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 attorney J. Daniel Skees 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,



Kenneth M. Kulak, Esq.
Morgan, Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103-3007
Ph: 215.963.5384
Fax: 215.963.5001
Email: ken.kulak@morganlewis.com

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

VERIFIED STATEMENT OF ROBERT P. GOLDFIN

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. 1044968) and New York (NY I.D. 5579701).
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,



Robert P. Goldfin, Esq.
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004-2541
Ph: 202.739.5377
Fax: 202.739.3001
E-mail: robert.goldfin@morganlewis.com

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 Robert P. Goldfin** 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

Patrick M. Cicero, Esq.
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1921
pcicero@paoca.org

Allison C. Kaster
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov

NazAarah Sabree, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Building
Forum Place, 5th Floor
300 North Second Street
Harrisburg, PA 17101
nsabree@pa.gov

Darren Gill
Pennsylvania Public Utility Commission
Bureau of Technical Utility Services,
Energy Division
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
dgill@pa.gov

Dated: November 22, 2024



Kenneth M. Kulak (Pa. No. 75509)
Morgan, Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103-3007
215.963.5384 (bus)
ken.kulak@morganlewis.com