



Todd S. Stewart  
717.703.0800  
[tssstewart@hmslegal.com](mailto:tssstewart@hmslegal.com)

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501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

April 2, 2025

**VIA ELECTRONIC FILING**

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

RE: Moravian Manors, Inc. d/b/a Moravian Manor Communities v. nTherm, LLC;  
Docket No. C-2025-3053949; **MOTION FOR ADMISSION *PRO HAC VICE***  
***OF NATARA FELLER***

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Admission *Pro Hac Vice* of Natara Feller in the above-captioned matter. A copy of this Motion has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Stewart", is written over the closing text.

Todd S. Stewart  
*Counsel for nTherm, LLC*

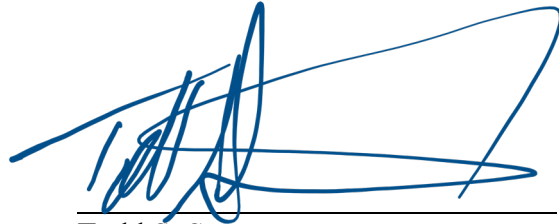
TSS/jld  
Enclosure  
cc: Per Certificate of Service

**CERTIFICATE OF SERVICE**

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

**VIA ELECTRONIC MAIL**

Matthew M. Hennesy, Esq.  
Barley Snyder  
126 East King Street  
Lancaster, PA 17602  
[mhennesy@barley.com](mailto:mhennesy@barley.com)  
*Counsel for Moravian Manors, Inc. d/b/a  
Moravian Manor Communities*



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Todd S. Stewart

DATED: April 2, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Moravian Manors, Inc. d/b/a Moravian Manor	:	
Communities,	:	
Complainant,	:	
	:	Docket No. C-2025-3053949
v.	:	
	:	
nTherm, LLC,	:	
Respondent.	:	

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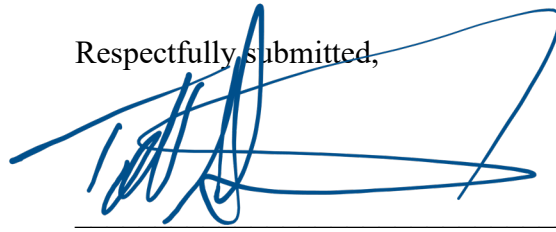
**MOTION FOR ADMISSION *PRO HAC VICE*  
OF NATARA FELLER  
ON BEHALF OF nTHERM, LLC**

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Pursuant to 52 Pa. Code §1.22(b) and the Pennsylvania Bar Admission Rules, 204 Pa. Code Rule 301, Todd S. Stewart an active member and a member in good standing of the bar of this Commonwealth (Attorney I.D. No. 75556), hereby moves that Natara Feller be admitted to appear *pro hac vice* and practice before the Pennsylvania Public Utility Commission as counsel for nTherm, LLC, in the above-captioned matter. The Verified Statement of Natara Feller 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,



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Todd S. Stewart, Attorney ID No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for nTherm, LLC*

DATED: April 2, 2025

# **EXHIBIT A**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Moravian Manors, Inc. d/b/a Moravian Manor :  
Communities, :  
Complainant, :  
: Docket No. C-2025-3053949  
v. :  
: :  
nTherm, LLC, :  
Respondent. :

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**VERIFIED STATEMENT OF NATARA FELLER**

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Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Pa. B.A.R. 301 and 1012.1, Todd S. Stewart, a member of the Bar of the Commonwealth of Pennsylvania (Attorney I.D. No. 75556), moves for my admission *pro hac vice* in the above-captioned proceedings. In support of Mr. Stewart’s Sponsor Motion and pursuant to Pa. B.A.R. 1012.1, I, Natara Feller candidate, submit this verification and hereby state as follows:

1. I am a member in good standing of the State Bars of New York (Bar No. 728957) New Jersey (Bar No. 032062005) and the District of Columbia (Bar No. 982179).
2. I am an experienced attorney with extensive knowledge of issues related to electric generation and natural gas suppliers.
3. I practice with the law firm of Feller Law Group, PLLC in Brooklyn, New York.
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 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 the following matters before the Pennsylvania Public Utility Commission: *Erie Indemnity Co. v. nTherm, LLC*, Docket No. C-2022-3036531, *Melvin Smith v. Rushmore Energy, LLC*, Docket No. F-2024-3051171, *Ailin Hospitality v. FirstEnergy Pennsylvania Electric Company and nTherm LLC*, Docket No. C-2024-3050928, and *Lorin and Jamie DeGroat v. nTherm, LLC*, Docket Number C-2024-3052230.

6. My *pro hac vice* application is pending before the Pennsylvania Public Utility Commission in *AILBF Hospitality, LLC v. nTherm, LLC and Columbia Gas of Pennsylvania*, Docket No. C-2024-3051511.

7. 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.

8. I consent to the appointment of Todd S. Stewart, and the law firm of HMS Legal LLP 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.

9. 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.

10. In support of this motion, Todd S. Stewart, Esq., attaches a Verification labelled as Exhibit B, which satisfies the requirements of the foregoing Rule of Civil Procedure.

11. 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 nTherm, LLC in the above captioned action.

Respectfully submitted,

/s/ Natara Feller  
Natara Feller  
Managing Partner  
Feller Law Group, PLLC  
159 20<sup>th</sup> St., Suite 1B  
Brooklyn, NY 11232  
[natarafeller@feller.law](mailto:natarafeller@feller.law)

DATED: April 2, 2025

# **EXHIBIT B**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Moravian Manors, Inc. d/b/a Moravian Manor :  
Communities, :  
Complainant, :  
 : Docket No. C-2025-3053949  
v. :  
 :  
nTherm, LLC, :  
Respondent. :

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**VERIFIED STATEMENT OF TODD S. STEWART**

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I, Todd S. Stewart, hereby state as follows:

1. I am admitted to practice law in the Commonwealth of Pennsylvania and am a member in good standing holding Bar No. 75556. 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.

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

3. Natara Feller is an attorney duly licensed in the State Bars of New York (Bar No. 728957) New Jersey (Bar No. 032062005) and the District of Columbia (Bar No. 982179). Ms.

Feller's address, telephone number, fax number, and email address are as follows:

Natara Feller  
Feller Law Group, PLLC  
159 20<sup>th</sup> St., Suite 1B  
Brooklyn, NY 11232  
[natarafeller@feller.law](mailto:natarafeller@feller.law)

4. Ms. Feller 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 New York, New Jersey and Washington, D.C.

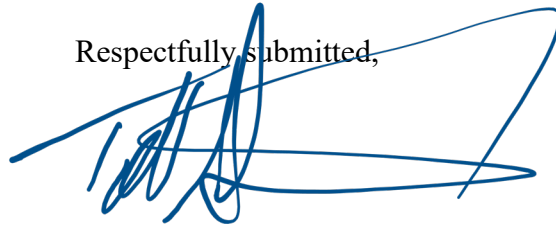
5. Ms. Feller is of good moral and professional character and, if required, will swear and affirm that she will demean herself as an attorney and counselor of this Court, uprightly and according to the law, and that she will support the Constitution of the United States.

6. After reasonable investigation, I believe Ms. Feller to be a reputable and competent attorney, and I am in a position to recommend her admission.

7. The proceeds from the settlement of a cause of action in which Ms. Feller 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 Ms. Feller be permitted to practice *pro hac vice* before the Pennsylvania Public Utility Commission in this proceeding.

Respectfully submitted,



---

Todd S. Stewart, Attorney ID No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for nTherm, LLC*

DATED: April 2, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Moravian Manors, Inc. d/b/a Moravian Manor	:	
Communities,	:	
Complainant,	:	
	:	Docket No. C-2025-3053949
v.	:	
	:	
nTherm, LLC,	:	
Respondent.	:	

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**ORDER GRANTING MOTION FOR ADMISSION  
*PRO HAC VICE* OF NATARA FELLER**

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Upon consideration of the Motion for Admission *Pro Hac Vice* of Natara Feller, it is this  
\_\_\_ day of April, 2025,

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

ORDERED, that Natara Feller is admitted *pro hac vice* for the purposes of representing  
nTherm, LLC in the above-captioned proceedings.

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J.