



April 4, 2025

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. Philadelphia Gas Works*, Docket No. R-2025-3053112

Dear Secretary Chiavetta,

Enclosed for filing in the above-referenced proceeding, please find the Motion for Admission *Pro Hac Vice* of Hema Lochan, Esq. Should you have any questions, please contact me at dmcdougall@earthjustice.org.

All parties are respectfully requested to include Ms. Lochan on their e-service list, at hlochan@earthjustice.org. As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Sincerely,

/s/ Devin McDougall

PA Attorney ID No. 329855

Supervising Senior Attorney

Earthjustice

1617 John F. Kennedy Blvd., Suite 2020

Philadelphia, PA 19103

dmcdougall@earthjustice.org

(917) 628-7411

cc:

The Honorable Eranda Vero
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et
al.

v.

Philadelphia Gas Works

Docket No. R-2025-3053112

Docket No. C-2025-3053827

Docket No. C-2025-3053978

Docket No. C-2025-3054216

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, Devin McDougall, Esq. (“Sponsor”) moves for the admission *pro hac vice* of Hema Lochan, Esq. (“Candidate”) to appear on behalf of POWER Interfaith, Sierra Club Pennsylvania, Physicians for Social Responsibility Pennsylvania, Clean Air Council, Vote Solar, PennEnvironment, and the Pennsylvania Public Interest Research Group (collectively, the “Energy Justice Advocates”) in the above-captioned proceeding of the Pennsylvania Public Utility Commission (the “Commission”).

1. Pursuant to Pa. R.C.P. No. 1012.1(b)(2), a Verified Statement of Devin McDougall, Esq. is attached hereto as Exhibit A, and a Verified Statement of Hema Lochan, 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 POWER and shall remain attorney of record.

3. Candidate is a member in good standing of the bar of the State of New York and the Southern District of New York, 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, 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. Candidate has significant experience in matters relating to energy law, and POWER has requested that Candidate be admitted to represent them in this proceeding.

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

Dated: April 4, 2025

/s/ Devin McDougall
PA Attorney ID No. 329855
Supervising Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmcDougall@earthjustice.org
(917) 628-7411

EXHIBIT A.

VERIFIED STATEMENT OF DEVIN MCDOUGALL, ESQ.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et
al.

v.

Philadelphia Gas Works

Docket No. R-2025-3053112

Docket No. C-2025-3053827

Docket No. C-2025-3053978

Docket No. C-2025-3054216

VERIFIED STATEMENT OF DEVIN MCDOUGALL, ESQ.

I, Devin McDougall, Esq. hereby state as follows:

1. I am a Supervising Senior Attorney at Earthjustice, a non-profit public interest law firm, in the Commonwealth of Pennsylvania.
2. I am admitted to practice law in the Commonwealth of Pennsylvania (PA ID 329855) 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 not acting as sponsor of a candidate for admission *pro hac vice* in any cases in any court of record in the Commonwealth other than the above-captioned proceeding.
5. After reasonable investigation, I reasonably believe Hema Lochan, Esq. to be a competent attorney.
6. I am in a position to recommend the admission *pro hac vice* of Hema Lochan, 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: April 4, 2025

/s/ Devin McDougall
PA Attorney ID No. 329855
Supervising Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmcDougall@earthjustice.org
(917) 628-7411

EXHIBIT B.

VERIFIED STATEMENT OF HEMA LOCHAN, ESQ.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et
al.

v.

Philadelphia Gas Works

Docket No. R-2025-3053112
Docket No. C-2025-3053827
Docket No. C-2025-3053978
Docket No. C-2025-3054216

VERIFIED STATEMENT OF HEMA LOCHAN, ESQ.

Pursuant to 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and Pa. R.C.P. No. 1012.1, Devin McDougall, Esq. (“Sponsor”), a member of the bar of the Commonwealth of Pennsylvania (PA ID 315012), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of Sponsor’s motion, I, Hema Lochan, Esq. state as follows:

1. I am an Associate Attorney in the Clean Energy Program of Earthjustice, and I work out of Earthjustice’s New York office. I was hired as an Associate Attorney at Earthjustice in August 2021 and have practiced energy law in various states including Michigan, Kentucky, Florida, and Arizona since then.

2. I am admitted to practice in the courts of the State of New York, as well as the Southern District of New York (Bar # 5941018). I am in good standing in each of these jurisdictions. I have never been suspended, disbarred, disciplined, or otherwise subject to any disciplinary proceeding in any of these jurisdictions.

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

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

5. 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.

6. 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.

7. 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 being sought.

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.

Date: April 4, 2025

/s/ Hema Lochan
Associate Attorney
Earthjustice
48 Wall St, 15th Floor
New York, NY 10043
(347) 282 – 6493

CERTIFICATE OF SERVICE

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

| | |
|--|--|
| <p>Harrison W. Breitman, Esq. Ryan Morden, Esq. Katherine Kennedy, Esq. Keith D. Earls, Paralegal Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 OCA25PGWBRC@paoca.org kearls@paoca.org</p> <p><i>Counsel for OCA</i></p> | <p>Rebecca Lyttle, Esq. Steven C. Gray, Esq. Office of Small Business Advocate Forum Place, 1st Floor 555 Walnut Street Harrisburg, PA 17101 relyttle@pa.gov sgray@pa.gov</p> <p><i>Counsel for OSBA</i></p> |
| <p>Carrie B. Wright, Esq. Michael A. Podskoch, Jr., Esq. Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 carwright@pa.gov mpodskoch@pa.gov</p> <p><i>Counsel for BIE</i></p> | <p>Daniel Clearfield, Esq. Bryce R. Beard, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 dclearfield@eckertseamans.com bbeard@eckertseamans.com</p> <p><i>Counsel for PGW</i></p> |
| <p>Joline R. Price, Esq. Daniela E. Rakhlina-Powsner, Esq. Benjamin Clark, Esq. Robert W. Ballenger, Esq. Community Legal Services, Inc. 1424 Chestnut Street Philadelphia, PA 19102 jprice@clsphila.org drakhlina-powsner@clsphila.org bclark@clsphila.org rballenger@clsphila.org</p> <p><i>Counsel for TURN and CAUSE-PA</i></p> | <p>Charis Mincavage, Esq. McNees Wallace & Nurick, LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108 cmincavage@mcneeslaw.com</p> <p><i>Counsel for the Philadelphia Industrial and Commercial Gas Users Group</i></p> |

| | |
|---|--|
| Dennis A. Whitaker, Esq. Kevin J. McKeon, Esq. Todd S. Stewart, Esq. Hawke McKeon & Sniscak LLP 100 N 10th Street Harrisburg, PA 17101 dawhitaker@hmslegal.com kjmckeon@hmslegal.com tsstewart@hmslegal.com | |
|---|--|

Dated: April 4, 2025

/s/ Devin McDougall
PA Attorney ID No. 329855
Supervising Senior Attorney
Earthjustice
1617 John F. Kennedy Blvd., Suite 2020
Philadelphia, PA 19103
dmcDougall@earthjustice.org
(917) 628-7411