

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

C-2024-3050663, C-2024-3050779,  
C-2024-3050912, C-2024-3050923,  
C-2024-3050949, C-2024-3050976,  
C-2024-3050975, C-2024-3050985,  
C-2024-3050979, C-2024-3051002 v  
PECO Energy company

Mediation Session

**MOTION TO CONSIDER WHETHER ATTORNEY ROBERT E. BARNES  
CAN PARTICIPATE IN PUC PROCEEDINGS, INCLUDING MAY 15, 2025,  
VIRTUAL MEDIATION DAMAGES SESSION**

TO THE HONORABLE COMMISSION:

Pursuant to 52 Pa. Code § 1.22 and other applicable rules of practice before the Pennsylvania Public Utility Commission ("Commission"), Complainants respectfully submit this Motion to Consider Whether Robert E. Barnes May Participate in Proceedings before the Commission in the above-captioned matters. In support thereof, Complainants state as follows:

I. INTRODUCTION

1. Robert E. Barnes is an attorney licensed and in good standing in the States of California, Tennessee and Wisconsin – but is not admitted to the bar of the Commonwealth of Pennsylvania.

2. Mr. Barnes seeks to represent Complainants pro hac vice through Pennsylvania attorney Bradford L. Geyer (see Admission of Pro Hac Vice Robert E Barnes - Residents of Solebury Twp. docketed May 9, 2025) or as otherwise authorized under Commission rules.

## II. LEGAL BASIS FOR PARTICIPATION

3. Under 52 Pa. Code § 1.22(b), an attorney not licensed in Pennsylvania may be permitted to appear before the Commission upon motion, subject to compliance with the rules governing admission pro hac vice and in association with Pennsylvania counsel.

4. The Commission has discretion under 52 Pa. Code § 1.8 to consider and rule on questions concerning the qualifications of representatives appearing before it, including out-of-state attorneys.

## III. REQUEST FOR RELIEF

WHEREFORE, Complainants respectfully request that the Commission:

1. Consider and determine whether Robert E. Barnes may participate in the above-captioned proceedings;
2. Grant leave for Mr. Barnes to appear on behalf of Complainants in these matters;
3. Alternatively, set a procedure for resolving the issue of Mr. Barnes's participation.

Respectfully submitted,



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Dated: May 13, 2025

**CERTIFICATE OF SERVICE**

I certify that the following were served on May 13, 2025, to the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54. :

**Via email:**

John M. Coogan  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
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Respectfully submitted,

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