



DEPARTMENT OF THE ARMY
UNITED STATES ARMY LEGAL SERVICES AGENCY
9275 GUNSTON ROAD
FORT BELVOIR, VIRGINIA 22060-5546

REPLY TO
ATTENTION OF
Lt. Colonel Carlos S. Ramirez

November 4, 2025

Matthew Homsher
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

via Electronic Filing/e-Mail

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation
Docket No. R-2025-3057164

Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission (Commission) in Docket No. R-2025-3057164 is a *Motion to Admit attorney John Joseph McNutt pro hac vice on behalf of the United States Department of Defense and all other Federal Executive Agencies*. This document is being filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the attached Certificate of Service.

Please contact me or my colleague, US Army regulatory law attorney John Joseph McNutt, if you have any questions concerning this filing.

Sincerely,

Lt. Colonel Carlos S. Ramirez-Vazquez
Attorney, United States Army
US Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-TCAP)
Fort Belvoir, Virginia 22060
carlos.s.ramirezvazquez.mil@army.mil

Cc: Deputy Chief Administrative Law Judge Christopher P. Pell (via E-mail)
Administrative Law Judge Barbara Shadie Nause (via E-mail)
Army attorney John Joseph McNutt, john.j.mcnutt.civ@army.mil | (m) (619) 302-9642

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3057164
	:	
PPL Electric Utilities Corporation	:	
	:	

**MOTION OF THE UNITED STATES DEPARTMENT OF DEFENSE
AND ALL OTHER FEDERAL EXECUTIVE AGENCIES FOR ADMISSION OF
JOHN JOSEPH MCNUTT *PRO HAC VICE***

In accordance with 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and Pa. R.C.P. No. 1012.1, sponsor US Army attorney Lt. Colonel Carlos S. Ramirez-Vazquez (Sponsor) moves for the admission *pro hac vice* of candidate attorney John Joseph McNutt (Candidate) to appear on behalf of the United States Department of Defense and all other Federal Executive Agencies (DOD/FEA) in Pennsylvania Public Utility Commission (Commission) Docket No. R-20254-3057164 (PPL Electric Utilities Corporation general rate case).

1. A Verified Statement of Lt. Colonel Carlos S. Ramirez-Vazquez is attached hereto as Exhibit A, and a Verified Statement of John Joseph McNutt is attached hereto as Exhibit B.

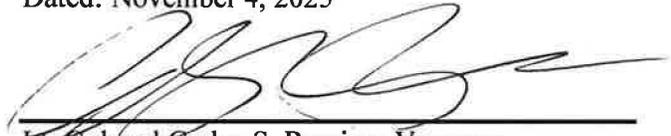
2. Sponsor is a member in good standing of the bar of the Commonwealth of Pennsylvania (PA Bar No. 306465) and has never been suspended, disbarred, or otherwise disciplined by a court or administrative body. Sponsor has entered an appearance in the above-captioned proceeding on behalf of DOD/FEA and shall remain attorney of record.

3. A *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.

4. Candidate has substantial experience in utility regulatory law. DOD/FEA requests that the Commission allow Candidate to represent DOD/FEA in this proceeding.

WHEREFORE, DOD/FEA and Sponsor request that the Commission admit John Joseph McNutt into this proceeding *pro hac vice* as counsel for DOD/FEA.

Dated: November 4, 2025



Lt. Colonel Carlos S. Ramirez-Vazquez
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(PA Bar No. 306465)

*Counsel for the United States Department of
Defense and all other Federal Executive Agencies*

EXHIBIT A

VERIFIED STATEMENT OF LT. COLONEL CARLOS S. RAMIREZ-VAZQUEZ

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :

v.

PPL Electric Utilities Corporation

:
:
:
:
:
:
:

Docket No. R-2025-3057164

VERIFIED STATEMENT OF CARLOS S. RAMIREZ-VAZQUEZ

I, Carlos S. Ramirez-Vazquez, hereby state as follows:

1. I am a Lieutenant Colonel in the United States Army Judge Advocate General Corps (JAG Corps). I am an attorney of law duly admitted to practice before the Supreme Court of Pennsylvania. I am a member in good standing of the Bar of the Commonwealth, and my attorney identification number is 306465.

2. I am counsel of record for the United States Department of Defense and all other Federal Executive Agencies (“DOD/FEA”) in this proceeding.

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.

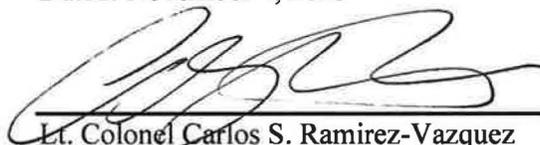
5. If there should be any proceeds from the settlement of this proceeding, such proceeds shall be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions, if applicable.

6. John J. McNutt is an Army attorney with the United States Army Legal Services Agency, Office of The Judge Advocate General, stationed at Fort Belvoir, Virginia. Mr. McNutt has more than 20 years of civil litigation and trial experience in state and federal courts and before regulatory agencies. Mr. McNutt is an active member in good standing in the following jurisdictions: (1) New York (admitted 2004); (2) District of Columbia (admitted 2005); and (3) California (admitted 2006).

7. After a reasonable investigation, I reasonably believe candidate McNutt is a reputable and competent attorney. I recommend his admission to this proceeding.

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 the penalties of 18 Pa.C.S. § 4904 (relating to sworn falsification to authorities).

Dated: November 4, 2025



Lt. Colonel Carlos S. Ramirez-Vazquez
US Army Legal Services Agency
Office of The Judge Advocate General
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(o) (703) 693-0787
(PA Bar No. 306465)

*Counsel for the United States Department of
Defense and all other Federal Executive Agencies*

EXHIBIT B

VERIFIED STATEMENT OF JOHN JOSEPH MCNUTT

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3057164
	:	
PPL Electric Utilities Corporation	:	
	:	

VERIFIED STATEMENT OF JOHN JOSEPH MCNUTT

I, John Joseph McNutt, hereby state as follows:

1. I submit this Verified Statement in Support of the Motion for Admission of candidate John McNutt *Pro Hac Vice* submitted by sponsor Lt. Colonel Carlos S. Ramirez-Vazquez on behalf of the United States Department of Defense and all other Federal Executive Agencies (DOD/FEA) in this proceeding.

2. I am a United States Army attorney and an active member in good standing of the bars of New York (admitted in 2004 – New York attorneys do not receive individual bar numbers), the District of Columbia (admitted in 2005 – Bar No. 491341), and California (admitted in 2006 – Bar No. 243975). I have never been suspended, disbarred, or otherwise disciplined in any of these jurisdictions or in any other jurisdiction. I am not currently subject to any disciplinary proceedings in any jurisdiction.

3. My contact information is as follows:

John Joseph McNutt
United States Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-ELD), Fort Belvoir, Virginia 22060
john.j.mcnutt.civ@army.mil | (619) 302-9642 (m)

4. I am a senior attorney with the United States Army and have an OPM Series classification GS-0905-15. The GS-0905-15 OPM classification series applies to attorneys who have demonstrated expertise in both preparation for trial and the trial of cases and rendering legal advice and services. I hold the highest classification for legal expertise in the federal government and am a designated subject matter expert for the United States Department of Defense in the field of utility regulatory law. I have more than 20 years of civil litigation and trial experience in state and federal courts and before regulatory agencies. I have extensive experience practicing before state regulatory commissions. Since 2020, I have represented the interests of DOD/FEA in utility regulatory matters in 15 states. The US Army Legal Services Agency has exclusive authority to represent the Department of Defense and all other Federal Executive Agencies in this proceeding and has requested that I appear and assist in this proceeding to protect the interests of military installations located in PPL's service territory. I am associated with Army attorney Lt. Colonel Carlos S. Ramirez-Vazquez – who is a member in good standing of the Pennsylvania Bar.

5. This proceeding is the only pending action in all courts of record in Pennsylvania in which I have applied for admission *pro hac vice*. I have never been denied admission through a *pro hac vice* motion in Pennsylvania or any other jurisdiction.

6. I shall comply with and be bound by the applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, the Rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission, and the Pennsylvania Rules of Professional Conduct.

7. I consent to the appointment of my sponsor, Lt. Colonel Carlos S. Ramirez-Vazquez 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.

8. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance in this proceeding.

9. The foregoing statements are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to sworn falsifications to authorities).

Dated: November 4, 2025



John Joseph McNutt
US Army Legal Services Agency
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9275 Gunston Road (JALS-ELD)
Fort Belvoir, Virginia 22060
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(o) (703) 693-1280

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 § 1.54 (relating to service by a party).

Via Electronic Mail

<p>Kimberly A. Klock Michael J. Shafer PPL Services Corporation 645 Hamilton Street, Suite 700 Allentown, PA 18104 kklock@pplweb.com mjshafer@pplweb.com</p>	<p>Devin T. Ryan Alice A. Wade Hayley E. Wilburn Post & Schell, P.C. One Oxford Centre 301 Grant Street, Suite 3010 Pittsburgh, PA 15219 dryan@postschell.com alice.wade@postschell.com hwilburn@postschell.com</p>
<p>David B. MacGregor Garrett P. Lent Post & Schell, P.C. 17 North Second Street 12th Floor Harrisburg, PA 17101-1601 dmacgregor@postschell.com glent@postschell.com</p>	<p>Michael A. Podskoch, Jr. Adam J. Williams Bureau of Investigation and Law Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120 mpodskoch@pa.gov adawilliam@pa.gov</p>
<p>Christy M. Appleby Harrison W. Breitman Jacob D. Guthrie Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101 cappleby@paoca.org hbreitman@paoca.org jguthrie@paoca.org</p>	<p>Daniel A. Garcia Brian Pulito Sarah M. Rambin Steptoe & Johnson, PLLC 1 PPG Place Pittsburgh, PA 15222 Daniel.garcia@Steptoe-Johnson.com Brian.Pulito@Steptoe-Johnson.com sarah.rambin@steptoe-johnson.com</p>
<p>Steven C. Gray Rebecca Lyttle Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923 sgray@pa.gov rlyttle@pa.gov</p>	<p>Alan Michael Seltzer John F. Povilaitis Buchanan Ingersoll & Rooney PC 409 N. Second Street, Suite 500 Harrisburg, PA 17101-1357 alan.seltzer@bipc.com john.povilaitis@bipc.com</p>

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Jennifer Woolley 2914 Hodle Ave. Easton, PA 18045-8103 jwoolley4@rcn.com	Lt. Colonel Carlos S. Ramirez-Vazquez US Army Legal Services Agency 9275 Gunston Road (JALS-TCAP) Fort Belvoir, Virginia 22060 Carlos.s.ramirezvazquez.mil@army.mil

Dated this 4th day of November 2025



John Joseph McNutt