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VIA eFILING

January 13, 2026

Matthew L. Homsher, Secretary
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: *Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company, Docket Nos. R-2025-3057983 and R-2025-3058051*

Dear Secretary Homsher:

Attached please find Cleveland-Cliffs Steel's Motion for Admission Pro Hac Vice for filing in the above-captioned proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

Sean M. Gallagher, Esq. (Pa.I.D. 318872)
GALLAGHER LAW GROUP

**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

KJB/kew

cc: Hon. Jeffrey A. Watson @ jeffwatson@pa.gov
Hon. Emily I. DeVoe @ edvoe@pa.gov
Cert. of Service

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing Cleveland-Cliffs Steel Motion for Admission Pro Hac Vice 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 this 13th day of January, 2026.

/s/ Kurt J. Boehm

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
vs.	:	Docket Nos. R-2025-3057983
	:	R-2025-3058051
Pennsylvania American Water Company	:	

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, Sean M. Gallagher, Esq., as counsel to Cleveland-Cliffs Steel (“Cleveland-Cliffs”) respectfully request that Your Honor enter an Order granting admission *pro hac vice* to Kurt J. Boehm as counsel to Cleveland-Cliffs, for all purposes related to the above-referenced proceeding. In support of this Motion, I, Sean M. Gallagher, 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 Cleveland-Cliffs in this proceeding and am an active member of the Bar of the Commonwealth of Pennsylvania (Pa.I.D. 318872).

2. Mr. Boehm is a licensed attorney in good standing in Ohio and Kentucky. Mr. Boehm has 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. Mr. Boehm 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. Mr. Boehm agrees to submit to the

jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during their appearance in this matter.

4. Mr. Boehm has consented to the appointment of Sean Gallagher, 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 Cleveland-Cliffs, as required by the Pennsylvania Rules of Civil Procedure

5. Mr. Boehm's Verified Statement for Admission Pro Hac Vice is attached.

WHEREFORE, I, Sean M. Gallagher, Esq., respectfully move for the admission of Kurt J. Boehm *pro hac vice*, on behalf of Cleveland-Cliffs Steel, for all permissible purposes related to the above-referenced proceeding.

Respectfully submitted,

/s/ Sean M. Gallagher
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January 13, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission vs. Pennsylvania American Water Company	: : : : : : : : : :	Docket Nos. R-2025-3057983 R-2025-3058051
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**VERIFIED STATEMENT OF
KURT J. BOEHM FOR ADMISSION *PRO HAC VICE***

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Sean M. Gallagher, Esq., a member of the Bar of the Commonwealth of Pennsylvania (Pa. I.D. 318872), 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 of good standing in the Bar of Ohio and Kentucky.
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 Sean M. Gallagher, 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,

/s/ Kurt J. Boehm

Kurt. J. Boehm, Esq.

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January 13, 2026