

Petition of IBEW Local 614 Requesting a Public, On-The-Record Investigation into the Reasonableness, Safety, Adequacy, and Sufficiency of the Service and Facilities of PECO Energy Company

Docket No. P-2026-3062224

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**MOTION FOR ADMISSION PRO HAC VICE**

I, Joseph D. Richardson, state the following:

1. Pursuant to 52 Pa. Code § 1.22(b), Pa. Bar Admission Rule 301(a), and 231 Pa. Code r. 1012.1, I hereby move for admission *pro hac vice* of Samuel B. Whillans to practice before the Pennsylvania Public Utilities Commission (Commission) in the above-captioned proceeding, Docket No. P-2026-3062224. I reasonably believe Samuel B. Whillans to be a reputable and competent attorney and accordingly, as his sponsor for admission, recommend him for admission.

2. In support of this motion, a verification from candidate Samuel B. Whillans is attached hereto, as per 231 Pa. Code r. 1012.1(c).

3. Additionally in support of this motion, I am supplying attached hereto a sponsor verification, as per 231 Pa. Code r. 1012.1(d)(2).

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, a *pro hac vice* candidate's appearance in this proceeding does not require the payment of any fee to the Pennsylvania Interest on Lawyers' Trust Accounts Board (IOLTA Board) pursuant

to 204 Pa. Code § 81.505(c) or the filing of an informational form with the IOLTA Board pursuant to 204 Pa. Code § 81.503(c) and 204 Pa. Code § 81.504.

5. Notice is hereby provided that any responsive pleading shall be filed within 20 days of the date of service of this motion, as per 52 Pa. Code § 5.103(b).

**WHEREFORE**, it is respectfully requested that Samuel B. Whillans be granted admission *pro hac vice* in the above-captioned proceeding on behalf of International Brotherhood of Electrical Workers Local Union 614.

Respectfully submitted,

/s/ Joseph D. Richardson

Joseph D. Richardson, Esq. (Pa. Bar No.  
311147)

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*Attorney for IBEW Local 614*

May 5, 2026

BEFORE THE  
PENNSYLVANIA PUBLIC SERVICE COMMISSION

Petition of IBEW Local 614 Requesting a Public, On-The-Record Investigation into the Reasonableness, Safety, Adequacy, and Sufficiency of the Service and Facilities of PECO Energy Company

Docket No. P-2026-3062224

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**SPONSOR'S VERIFIED STATEMENT IN  
SUPPORT OF MOTION FOR ADMISSION  
PRO HAC VICE**

I, Joseph D. Richardson, state the following:

1. After reasonable investigation, I reasonably believe Samuel B. Whillans to be a reputable and competent attorney. Accordingly, I am in a position to recommend his admission *pro hac vice* in the above-captioned matter.

2. I am acting as the sponsor of a candidate for admission *pro hac vice* in the following cases in all courts of record and administrative bodies in this Commonwealth:

- For both Samuel B. Whillans and Scott H. Strauss, in the above-captioned matter, Petition of IBEW Local 614 Requesting a Public, On-The-Record Investigation into the Reasonableness, Safety, Adequacy, and Sufficiency of the Service and Facilities of PECO Energy Company, Docket No. P-2026-3062224.

3. The proceeds from the settlement of any cause of action in which candidate Samuel B. Whillans is granted admission *pro hac vice* 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 thereof, if applicable.

4. I verify that the foregoing statements are true and correct to the best of my knowledge, information and belief. I understand that the statements are made subject to the penalties of 18 Pa. Cons. Stat. § 4904, relating to unsworn falsification to authorities.

Respectfully submitted,

/s/ Joseph D. Richardson

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311147)

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*Attorney for IBEW Local 614*

May 5, 2026

BEFORE THE  
PENNSYLVANIA PUBLIC SERVICE COMMISSION

Petition of IBEW Local 614 Requesting a  
Public, On-The-Record Investigation into  
the Reasonableness, Safety, Adequacy,  
and Sufficiency of the Service and  
Facilities of PECO Energy Company

Docket No. P-~~2025~~-~~-----~~  
2026-3062224

**CANDIDATE'S VERIFIED STATEMENT IN  
SUPPORT OF MOTION FOR ADMISSION PRO  
HAC VICE**

I, Samuel B. Whillans, state the following:

1. I am a member in good standing of the District of Columbia Bar:

The District of Columbia Bar  
901 4th Street, NW  
Washington, D.C. 20001  
(202) 737-4700  
<https://www.dcbar.org/>

My membership number for the District of Columbia Bar is 90001263.

2. With respect to the jurisdiction in which I am licensed, I have never been suspended, disbarred, or otherwise disciplined, nor am I subject to any disciplinary proceedings.

3. I have never been denied *pro hac vice* admission in any action in any court of record or administrative body in Pennsylvania. There are no currently pending requests for admission.

4. 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.

5. 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 above-captioned matter.

6. I have consented to the appointment of Joseph D. Richardson 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 above-captioned matter.

7. I verify that the foregoing statements are true and correct to the best of my knowledge, information and belief. I understand that the statements are made subject to the penalties of 18 Pa. Cons. Stat. § 4904, relating to unsworn falsification to authorities.

Respectfully submitted,



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April 29, 2026

BEFORE THE  
PENNSYLVANIA PUBLIC SERVICE COMMISSION

Petition of IBEW Local 614 Requesting a  
Public, On-The-Record Investigation into  
the Reasonableness, Safety, Adequacy, and  
Sufficiency of the Service and Facilities of  
PECO Energy Company

Docket No. P-2026-3062224

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion and verifications has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA ELECTRONIC MAILING**

Anthony E. Gay  
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*Attorney for IBEW Local 614*

Dated on this 5th day of May, 2026.