

**KEYES, FOX
& WIEDMAN**
LLP

July 30, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utilities Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**RE: Pennsylvania Public Utility Commission v. PECO Energy Company
Docket R-2015-2468981, C-2015-2475585, C-2014-2477974**

Dear Secretary Chiavetta:

Please find enclosed The Alliance for Solar Choice's (TASC) *Request to Appear Without Sponsoring Counsel*, and its *Certificate of Service*, evidencing service upon parties of record in this proceeding.

Please contact me if you have any questions regarding this filing.

Sincerely,



Blake Elder
Assistant
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cc: Secretary Rosemary Chiavetta
Joseph Minott
Service List R-2015-2468981



July 30, 2015

Hon. Angela T. Jones
Administrative Law Judge
PA Public Utilities Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

**RE: Pennsylvania Public Utility Commission v. PECO Energy Company
Docket R-2015-2468981, C-2015-2475585, C-2014-2477974**

Dear Honorable Judge Jones:

Please find enclosed The Alliance for Solar Choice's (TASC) *Request to Appear Without Sponsoring Counsel* at the evidentiary hearings scheduled in this case. The enclosed, and its *Certificate of Service*, were electronically filed today, July 30th, 2015 with the Pennsylvania Public Utilities Commission. All Parties of Record have been sent a copy of the enclosed pursuant to the attached *Certificate of Service*.

Thanks.

Very truly yours,

A handwritten signature in black ink that reads "David R. Wooley".

David R. Wooley, Esq.
Of Counsel
Keyes, Fox & Weidman LLP
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Tel: (510) 314-8207
E-Mail: dwooley@kfwlaw.com

cc: Secretary Rosemary Chiavetta
Joseph Minott
Service List R-2015-2468981

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, et al.	:	
	:	
v.	:	R-2015-2468981
	:	C-2015-2475585
PECO Energy Company	:	C-2014-2477974

REQUEST TO APPEAR WITHOUT SPONSORING COUNSEL

The Alliance for Solar Choice (TASC) requests leave for its Counsel, David Wooley, to appear at the evidentiary hearing in this matter without sponsoring counsel. In support of its request, TASC states as follows:

- 1) David Wooley was granted leave to appear *pro hac vice* in this case as counsel for TASC by the Prehearing Conference Order #3 dated May 14 2015.
- 2) Joseph Minott serves as sponsoring counsel and attorney of record for TASC in this proceeding. Mr. Minott has a conflict that prevents him from being present at the evidentiary hearings in this case on August 11-14, 2015.
- 3) Counsel for TASC has written to all parties in this case to inquire if there would be any objection to a request to excuse Mr. Minott from appearing at the evidentiary hearing. No party expressed an objection to this request.
- 4) The rules governing *pro hac vice* appearances give discretion to the presiding judge to excuse local counsel from being present at evidentiary hearings. 231 Pa. Code Rule 1012.1. states:

Admission Pro Hac Vice. Motion. Content.

(d)(1) The sponsor shall enter an appearance as attorney of record in the action on behalf of the party whom the candidate seeks to represent. Upon the motion being granted, the sponsor shall remain the attorney of record for that party, and shall sign and serve, or be served with as the case may be, all notices, orders, pleadings or other papers filed in the action, and shall attend all proceedings before the court unless excused by the court.

WHEREFORE, The Alliance For Solar Choice respectfully requests that its local counsel and sponsoring attorney be excused from attendance at the evidentiary hearing in this matter.

Respectfully submitted,



Joseph Otis Minott, Esq.
Counsel of Record for
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July 30, 2015

VERIFICATION

I, David Wooley, on behalf of The Alliance for Solar Choice, hereby state that the facts contained in the foregoing request are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: July 30, 2015



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CERTIFICATE OF SERVICE

RE: Pennsylvania Public Utility Commission v. PECO Energy Company
Docket R-2015-2468981, C-2015-2475585, C-2014-247794

I hereby certify that I have this day served a true copy of the foregoing document upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 30th day of July 2015.

SERVICE BY FIRST CLASS U.S. MAIL, POSTAGE PREPAID
(eServed as a courtesy, if email available)

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