



VIA EFILE

January 16, 2019

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17105

Re: Implementation of Chapter 32 of the Public Utility Code Re: Pittsburgh Water and Sewer Authority, Docket Nos. M-2018-2640802, 2640803

Motion for Admission Pro Hac Vice of Cecilia Segal, Esq.

Dear Secretary Chiavetta,

Enclosed for filing, please find the **Motion for Admission Pro Hac Vice of Cecilia Segal, Esq.** A copy of this filing has been served on all parties of record to this proceeding consistent with the enclosed Certificate of Service.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

A handwritten signature in blue ink that reads "Elizabeth R. Marx".

Elizabeth R. Marx
Co-Counsel for Pittsburgh UNITED

CC: Hon. Mark A. Hoyer (ALJ)
Hon. Conrad A. Johnson (ALJ)
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the	:	Docket No.	M-2018-2640802
Public Utility Code Re Pittsburgh	:		M-2018-2640803
Water and Sewer Authority	:		

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and Rule 301(b) of the Pennsylvania Bar Admission Rules, Attorney of Record for Pittsburgh UNITED, Peter J. DeMarco, respectfully requests the Presiding Administrative Law Judge to enter an Order granting admission *pro hac vice* to Cecilia Segal as counsel for Pittsburgh UNITED for all purposes in relation to this proceeding. In support of this Motion, the Movant, Peter J. DeMarco, avers as follows:

1. I am an active member of the Bar of the Pennsylvania Supreme Court (PA ID: 319087). Pursuant to 52 Pa. Code § 1.24(b)(1), I have entered my appearance as counsel of record for Pittsburgh UNITED in this proceeding.

2. Cecilia Segal is an attorney employed by the Natural Resources Defense Council, with offices at 111 Sutter St., Floor 21, San Francisco, CA 94104. She is a graduate of Harvard Law School. She is admitted to practice law in California (Attorney No. 310935, admitted October 27, 2016). She is currently on active status and is in good standing. Ms. Segal has never been suspended, disbarred, or been the subject of disciplinary proceedings in Pennsylvania or any other state.

3. Ms. Segal 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. Ms. Segal agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during her appearance in this matter.

4. Ms. Segal has consented to the appointment of Peter J. DeMarco as her sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record on behalf of Pittsburgh UNITED.

WHEREFORE, Peter J. DeMarco, Movant and Counsel of Record for Pittsburgh UNITED, respectfully moves for the admission of Cecilia Segal to appear in this matter *pro hac vice* for Pittsburgh UNITED for all permissible purposes in relation to this proceeding.

Respectfully submitted,



Peter J. DeMarco, PA ID: 319087
Natural Resources Defense Council
1152 15th St. NW, Ste. 300
Washington, DC 20005
Tel: (202) 513-6267
Fax: (415) 795-4799
pdemarco@nrdc.org

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the	:	Docket No.	M-2018-2640802
Public Utility Code Re Pittsburgh	:		M-2018-2640803
Water and Sewer Authority	:		

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

I, Peter J. DeMarco, state the following:

1. After reasonable investigation, I reasonably believe that Cecilia Segal is a reputable and competent attorney. Accordingly, I am in a position to recommend her admission *pro hac vice* in the above-captioned matter.

2. I am the sponsor of candidates for admission *pro hac vice* in one other matter in a court of Pennsylvania: *Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority* (Docket Nos. R-2018-3002645, R-2018-3002467), before this Commission. I am the sponsor of Ms. Segal and of Ms. Dimple Chaudhary in that matter.

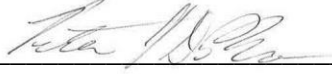
3. Any proceeds from the settlement of a cause of action in which Ms. Segal is granted admission *pro hac vice* shall be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

4. I shall remain the attorney of record for this case, as required by the Pennsylvania Rules of Civil Procedure.

5. 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 the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Date: January 16, 2019

Respectfully submitted,



Peter J. DeMarco, PA ID: 319087
Natural Resources Defense Council
1152 15th St. NW, Ste. 300
Washington, DC 20005
Tel: (202) 513-6267
Fax: (415) 795-4799
pdemarco@nrdc.org

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the	:	Docket No.	M-2018-2640802
Public Utility Code Re Pittsburgh	:		M-2018-2640803
Water and Sewer Authority	:		

**VERIFIED STATEMENT OF CECILIA SEGAL IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Rule of Civil Procedure 1012.1, Peter J. DeMarco, a member of the bar of the Supreme Court of Pennsylvania (PA ID: 319087), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, Cecilia Segal, submit this verified statement:

1. I am admitted to practice in and am a member in good standing of the bar of California (Attorney No. 310935, admitted October 27, 2016). I have never been suspended, disbarred, or otherwise disciplined, nor am I currently the subject of any disciplinary proceeding.

2. I have applied for and been granted admission *pro hac vice* in one other pending matter in a court of Pennsylvania: *Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority* (Docket Nos. R-2018-3002645, R-2018-3002467), before this Commission.

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.

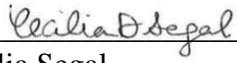
4. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.

5. I consent to the appointment of the sponsoring attorney, Peter J. DeMarco, 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 the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

Date: January 16, 2019

Respectfully submitted,

A handwritten signature in cursive script, reading "Cecilia Segal", positioned above a horizontal line.

Cecilia Segal

Natural Resources Defense Council

111 Sutter St., Floor 21

San Francisco, CA 94104

Tel: (415) 875-6112

Fax: (415) 795-4799

csegal@nrdc.org

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the	:	Docket No. M-2018-2640802
Public Utility Code Re Pittsburgh	:	M-2018-2640803
Water and Sewer Authority	:	

Certificate of Service

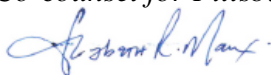
I hereby certify that I have this day served copies of the **Motion for Admission Pro Hac Vice of Cecelia Segal, Esq.** upon the parties of record in the above-captioned proceeding in accordance with the requirements of 52 Pa. Code 1.54 in the manner and upon the persons listed below.

VIA FIRST CLASS MAIL AND/OR EMAIL

The Honorable Mark A. Hoyer Deputy Chief Administrative Law Judge Piatt Place, Suite 220 301 Fifth Avenue Pittsburgh, PA 15222 mhoyer@pa.gov	The Honorable Conrad A. Johnson Administrative Law Judge Piatt Place, Suite 220 301 Fifth Avenue Pittsburgh, PA 15222 cojohnson@pa.gov
Daniel Clearfield, Esq. Deanne O'Dell, Esq. Karen O. Moury, Esq. Carl R. Schultz, Esq. Eckert Seamans Cherin & Mellot, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 dclearfield@eckertseamans.com dodell@eckertseamans.com kmoury@eckertseamans.com cschultz@eckertseamans.com	Christine M Hoover, Esq. Erin L. Gannon, Esq. Lauren M. Burge, Esq. Office of Consumer Advocate 555 Walnut Street 5th Floor Forum Place Harrisburg, PA 17101 OCAPWSA2018@paoca.org choover@paoca.org lburge@paoca.org
Gina L. Miller, Esq. John M. Coogan, Esq. Richard A Kanaskie, Esq. Bureau of Investigation and Enforcement 400 North Street 2nd Floor West Harrisburg, PA 17120 ginmiller@pa.gov jcoogan@pa.gov	Susan Simms Marsh, Esquire Pennsylvania-American Water Company 800 West Hersheypark Drive Hershey, PA 17033 susan.marsh@amwater.com

Michael A. Gruin, Esq. Stevens & Lee 17 North Second Street, 16th Floor Harrisburg, PA 17101 mag@stevenslee.com	Sharon Webb, Esq. Erin K. Fure, Esq. Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 efure@pa.gov swebb@pa.gov
Michelle Narccatati Chapkis Mayor's Blue Ribbon Panel on Restructuring the PWSA c/o Women for a Healthy Environment 5877 Commerce Street Pittsburgh, PA 15206	

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Co-counsel for Pittsburgh UNITED



Elizabeth R. Marx, PA ID 309014
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

January 16, 2019