



May 12, 2020

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Petition of PECO Energy Company for Approval of Its Default Service Program for the Period from June 1, 2021 through May 31, 2025 Docket No. P-2020-3019290

Motion for Admission Pro Hac Vice of Kintéshia Scott, Esq.

Dear Secretary Chiavetta:

Enclosed for filing, please find the **Motion for Admission Pro Hac Vice of Kintéshia Scott, Esq.** A copy of this filing has been served on all parties of record to this proceeding consistent with the enclosed Certificate of Service. If you have any questions, please do not hesitate to contact me.

Sincerely,

Joline R. Price

Counsel for TURN et al.

Enc.

Cc: Service list

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of Its Default Service Program for : P-2020-3019290
the Period From June 1, 2021 Through :
May 31, 2025 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of TURN *et al.*'s **Motion for Admission Pro Hac Vice of Kintéshia Scott, Esq.** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54.

VIA EMAIL

W. Craig Williams, Esquire
Exelon Business Services
2301 Market Street
Legal Department S23-1
Philadelphia Pa 19103
Craig.williams@exelon.com

Jack Garfinkle, Esq.
PECO Energy Company
2301 Market Street
Legal Department S 23-1
Philadelphia, PA 19103
Jack.garfinkle@exeloncorp.com

Anthony Gay, Esq.
Exelon General Counsel
2301 Market Street
Legal Department S 23-1
Philadelphia, PA 19103
Anthony.gay@exeloncorp.com

Aron J. Beatty, Esq.
David T. Evrard, Esq.
Office of Consumer Advocate
555 Walnut Street
5th floor, Forum Place
Harrisburg, PA 17101-1923
abeatty@paoca.org
devrard@paoca.org

Kenneth M. Kulak, Esquire
Anthony C. DeCusatis, Esquire
Catherine G. Vasudevan, Esquire
Brooke E. McGlinn, Esquire
Morgan, Lewis & Bockius
1701 Market Street
Philadelphia, PA 19103
ken.kulak@morganlewis.com
anthony.decusatis@morganlewis.com
catherine.vasudevan@morganlewis.com
brooke.mcglinn@morganlewis.com

Erin Fure
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 1710
efure@pa.gov
Richard Kanaskie, Esquire
Director and Chief Prosecutor
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg PA 17105-3265
rkanaskie@pa.gov

Charis Mincavage, Esq.
Adeolu A Bakare, Esq.
Jo-Anne S. Thompson
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, Pennsylvania 17108
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
jthompson@mcneeslaw.com

Elizabeth Marx
John Sweet
Ria Pereira
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Joseph Otis Minott, Esq.
Ernest Logan Welde, Esq.
Devin McDougall, Esq.
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103
Counsel for Environmental Stakeholders
joe_minott@cleanair.org
lwelde@cleanair.org
dmcdougall@earthjustice.org

Karen O. Moury, Esq.
Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Fl.
Harrisburg, PA 17101
kmoury@eckertseamans.com
dodell@eckertseamans.com

John F. Lushis, Jr.
Norris Mclaughlin, P.A.
515 W. Hamilton Street, Suite 502
Allentown, Pa 18101
Counsel For Calpine Retail Holdings, LLC
jlushis@norris-law.com

Gregory L. Peterson
Kevin Blake
Thomas Puchner
201 West Third Street, Suite 205
Jamestown, NY 14701-4907
Counsel for StateWise
gpeterson@phillipslytle.com
kblake@phillipslytle.com
tpuchner@phillipslytle.com



Joline Price, Esquire
PA ID: 315405
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
T: 215-981-3756
jprice@clsphila.org

May 12, 2020

Counsel for TURN et al.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of Its Default Service Program for : P-2020-3019290
the Period From June 1, 2021 Through :
May 31, 2025 :

Motion for Admission Pro Hac Vice of Kintéshia Scott, Esq.

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 TURN *et al.*, Joline R. Price, respectfully moves for the admission *pro hac vice* of Kintéshia Scott, Esquire to appear as counsel for TURN *et al.* for all purposes in relation to this proceeding. In support of this Motion, the Movant Joline R. Price, avers as follows:

1. In support of this motion, a Verified Statement of Joline R. Price, Esquire is attached hereto as Exhibit A, and a Verified Statement of Kintéshia Scott, Esquire is attached hereto as Exhibit B.

2. I am an active member of the Bar of the Pennsylvania Supreme Court (PA ID: 315405). Pursuant to 52 Pa. Code § 1.24(b)(1), I have entered my appearance as counsel of record for TURN *et al.* in this proceeding.

3. Kintéshia Scott is an attorney employed by Community Legal Services of Philadelphia, which is located at 1424 Chestnut Street, Philadelphia PA, 19102. She is a graduate of the University of South Carolina School of Law. She is admitted to practice law in Texas (Attorney ID: 24106413, admitted 2017). She is currently on active status and is in good standing. She has never been suspended, disbarred, or been the subject of disciplinary proceedings in Pennsylvania or any other state. Ms. Scott has submitted an application to the Pennsylvania Board of Bar Examiners to be admitted under Rule 311.

4. Ms. Scott agrees 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. Scott 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. Scott has consented to the appointment of Joline R. Price as her sponsor, who has filed her notice of appearance in this matter and who will remain counsel of record on behalf of TURN *et al.*

WHEREFORE, Joline R. Price, Movant and Counsel of Record for TURN *et al.* respectfully moves for the admission of Kintéshia Scott to appear in this matter *pro hac vice* for TURN *et al.* for all permissible purposes in relation to this proceeding.

Respectfully submitted,



Joline Price, Esquire
Attorney ID: 315405
Attorney for TURN *et al.*
COMMUNITY LEGAL SERVICES, INC.
jprice@clsphila.org
(215) 981-3756

May 12, 2020

Exhibit A

**Verified Statement of Joline R. Price, Esquire In Support of
Motion for Admission *Pro Hac Vice***

I, the undersigned, do hereby certify and state under penalty of perjury and subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney with Community Legal Services of Philadelphia, my office is located in Philadelphia, Pennsylvania, and I am a resident of Pennsylvania.
2. Robert W. Ballenger, Josie B.H. Pickens, and I currently represent TURN *et al.* in this matter and shall continue to serve as the attorneys of record for this proceeding in accordance with the Pennsylvania Rules of Civil Procedure.
3. I am a member in good standing of the Commonwealth of Pennsylvania (PA ID: 315405).
4. After reasonable investigation, I reasonably believe that Ms. Scott is a reputable and competent attorney and I recommend her admission *pro hac vice*.
5. Currently, I am not sponsoring any other attorney admitted *pro hac vice* in a Pennsylvania proceeding.
6. Any proceeds from any settlement in this matter 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.
7. I aver that *pro hac vice* appearance before the Pennsylvania Public Utility Commission is the equivalent to appearance before a special court, and that no fee paid to the IOLTA Board is therefore required for Ms. Scott to appear *pro hac vice* in the above-referenced proceeding. See 204 Pa. Code § 81.505(c).

Respectfully submitted,



Joline Price, Esquire
Attorney ID: 315405
Attorney for TURN *et al.*
COMMUNITY LEGAL SERVICES, INC.
jprice@clsphila.org
(215) 981-3756

May 12, 2020

Exhibit B

**Verified Statement of Kintéschia Scott, Esquire In Support of
Motion for Admission *Pro Hac Vice***

I, the undersigned, do hereby certify and state under penalty of perjury and subject to the penalties provided by 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities) that the following facts are true and correct to the best of my knowledge, information or belief:

1. I am an attorney who is not currently admitted to the bar of the Commonwealth of Pennsylvania and am seeking permission to appear *pro hac vice* before the Pennsylvania Public Utility Commission on behalf of TURN *et al.* in this matter.

2. I am admitted to practice in State of Texas (Attorney ID: 24106413) and am a member in good standing. I have applied to the Pennsylvania Board of Bar Examiners to be admitted under Rule 311.

3. I am not, nor have I ever been, suspended, disbarred, or otherwise disciplined in any court or administrative body. I am not, nor have I ever been, subject to any disciplinary proceedings.

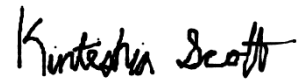
4. I have never been denied *pro hac vice* admission in any proceeding nor are there any current pending requests for such admission.

5. I recently commenced employment as staff attorney with Community Legal Services of Philadelphia, and in that role after admission to the Pennsylvania Bar, will represent TURN *et al.* and various other clients in numerous regulatory and other legal matters.

6. If granted *pro hac vice* admission, I will comply with and be bound by the applicable statutes, case law and procedural rules of the Pennsylvania Public Utility Commission and, as applicable, the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

7. I consent to the appointment of the sponsoring attorney, Joline R. Price, 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.

Respectfully submitted,



Kintéshia Scott Esquire
Staff Attorney
COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102
kscott@clsphila.org
(267) 765-6490

May 12, 2020