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May 12, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of the Industrial Energy Consumers of Pennsylvania to Suspend
Implementation of the Act 129 Phase IV Requirements and for Other Relief;
Docket No. P-2020-3019562

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Keystone Energy Efficiency Alliance's Motion for Admission *Pro Hac Vice*, with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Sarah C. Stoner

Sarah C. Stoner

SCS/jls
Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Date: May 12, 2020

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Sarah C. Stoner

Sarah C. Stoner, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Industrial Energy Consumers :
of Pennsylvania to Suspend : Docket No. P-2020-3019562
Implementation of the Act 129 Phase IV :
Requirements and for Other Relief :

NOTICE TO PLEAD

TO: Parties of Record

You are hereby notified that a responsive pleading to the enclosed **Motion for Admission *Pro Hac Vice* of the Keystone Energy Efficiency Alliance (“KEEA”)** must be filed within 20 days of the date of service. All responsive pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for KEEA and the Administrative Law Judges assigned this matter.

File with:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Sarah C. Stoner, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
sstoner@eckertseamans.com

Due to the COVID-19 pandemic, the Pennsylvania Public Utility Commission is encouraging individuals to eFile documents. Information regarding eFiling with the Commission is available at <https://www.puc.pa.gov/efiling/default.aspx>.

Date: May 12, 2020

Sarah C. Stoner

Sarah C. Stoner, Esquire
Attorney for the Keystone Energy Efficiency Alliance

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Industrial Energy Consumers :
of Pennsylvania to Suspend : Docket No. P-2020-3019562
Implementation of the Act 129 Phase IV :
Requirements and for Other Relief :

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and Pa. R.C.P. No. 1012.1, Sarah C. Stoner of Eckert Seamans Cherin & Mellott, LLC (“Sponsor”) moves for the admission *pro hac vice* of Erin Cosgrove, Esq. (“Candidate”) to appear on behalf of Keystone Energy Efficiency Alliance (“KEEA”) in the above-captioned proceeding pending before the Pennsylvania Public Utility Commission (the “Commission”).

1. Pursuant to Pa. R.C.P. No. 1012.1(b)(2), a Verified Statement of Sarah C. Stoner, Esq. is attached hereto as Exhibit A, and a Verified Statement of Erin Cosgrove, Esq. is attached hereto as Exhibit B.

2. Sponsor is a member in good standing of the bar of the Commonwealth of Pennsylvania and has never been suspended, disbarred, or otherwise disciplined by a court or administrative body. Sponsor represents KEEA in the above-captioned proceeding and shall remain attorney of record.

3. Candidate is a member in good standing of the bar of the State of New Jersey and has never been suspended, disbarred, or otherwise disciplined by any court or administrative body.

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, Candidate’s appearance in this proceeding *pro hac vice* does not require the payment of any fee to the Pennsylvania

Interest on Lawyers' Trust Accounts Board ("IOLTA Board") under 204 Pa. Code § 81.505(c) or the filing of an informational form with the IOLTA Board under 204 Pa. Code § 81.503(c) and 204 Pa. Code § 81.504.

5. Candidate has experience in matters relating to energy efficiency, and KEEA requests that Candidate be admitted to represent it in this proceeding.

WHEREFORE, the undersigned respectfully moves that Erin Cosgrove, Esq. be admitted to appear *pro hac vice* on behalf of KEEA in this proceeding.

Respectfully submitted,

Sarah C. Stoner

Sarah C. Stoner, Esq.
Attorney ID No.: 313793
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213 Market St., 8th Floor
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Date: May 12, 2020

EXHIBIT A

VERIFIED STATEMENT OF SARAH STONER

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Industrial Energy Consumers :
of Pennsylvania to Suspend : Docket No. P-2020-3019562
Implementation of the Act 129 Phase IV :
Requirements and for Other Relief :

VERIFIED STATEMENT OF SARAH STONER

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 the law firm of Eckert Seamans Cherin & Mellott, LLC, my office is located in Harrisburg, Pennsylvania, and I am a resident of Pennsylvania.
2. I currently represent the Keystone Energy Efficiency Alliance in this matter and will continue to serve as the attorney of record for this proceeding.
3. I am a member in good standing of the Commonwealth of Pennsylvania (bar number 313793).
4. After reasonable investigation, I reasonably believe that Ms. Erin Cosgrove is a reputable and competent attorney and I recommend her admission *pro hac vice*.
5. Currently, I am acting as the sponsor of one candidate for admission *pro hac vice* in a separate matter pending before the Pennsylvania Public Utility Commission.

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.

Respectfully submitted,

Sarah C. Stoner

Sarah C. Stoner, Esq.
Attorney ID No.: 313793
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Harrisburg, PA 17101
Tel (717) 237-6026
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Date: May 12, 2020

EXHIBIT B

VERIFIED STATEMENT OF ERIN COSGROVE

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Industrial Energy Consumers	:	
of Pennsylvania to Suspend	:	Docket No. P-2020-3019562
Implementation of the Act 129 Phase IV	:	
Requirements and for Other Relief	:	

VERIFIED STATEMENT OF ERIN COSGROVE

Pursuant to 52 Pa. Code § 1.22(b), Pa.B.A.R. 301(b), and Pa. R.C.P. No. 1012.1, Sarah C. Stoner, Esq., a member of the bar of the Commonwealth of Pennsylvania (PA ID No. 313793), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of Sponsor’s motion, I, Erin Cosgrove, state as follows:

1. I am admitted to practice in and am a member in good standing of the bar of New Jersey (Attorney No. 249442017, admitted October 24, 2017). I have never been suspended, disbarred, or otherwise disciplined, nor am I currently the subject of any disciplinary proceedings.

2. I am employed as Policy Counsel at the Keystone Energy Efficiency Alliance (“KEEA”). I began working at KEEA in October 2019.

3. I have not applied for admission *pro hac vice* in any other pending action in any court of record in Pennsylvania.

4. I have never had an application for admission *pro hac vice* denied in any court of record in Pennsylvania.

5. If granted *pro hac vice* admission, I shall 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.

6. If granted *pro hac vice* admission, I shall submit to the jurisdiction of the Pennsylvania Public Utility Commission and, to the extent applicable, 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.

7. I consent to the appointment of the Sponsor 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 being sought.

8. The foregoing statements are true to the best of my knowledge, information, and belief. I understand that the statements herein made are subject to penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Respectfully Submitted,



Erin Cosgrove, Esq.
NJ Attorney No. 249442017
Policy Counsel
Keystone Energy Efficiency Alliance
14 S. 3rd Street
Philadelphia, PA 19106
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Date: May 12, 2020