

June 2, 2021

***Via Electronic Filing***

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

**RE: Docket R-2021-3024750, Pennsylvania Public Utility Commission v. Duquesne Light Company**

**Motion for Admission *Pro Hac Vice* for Mr. Dunbar**

Dear Secretary Chiavetta,

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Admission *Pro Hac Vice* for Mr. Dunbar in the above-referenced proceeding. An electronic copy of this filing will be provided to those listed on the Certificate of Service.

Please contact me if you have any questions concerning this matter.

Respectfully submitted,

/s/ James M. Van Nostrand  
James M. Van Nostrand  
Pennsylvania Bar # 327054  
Keyes & Fox LLP  
275 Orchard Drive  
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(304) 777-6050  
[jvannostrand@keyesfox.com](mailto:jvannostrand@keyesfox.com)

Counsel for: ChargePoint, Inc.

CC: Deputy Chief Administrative Law Judge Joel H. Cheskis  
Chief Administrative Law Judge John M. Coogan  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3024750
	:	
Duquesne Light Company	:	

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**MOTION FOR ADMISSION *PRO HAC VICE***

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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, Counsel of Record for ChargePoint, Inc. (ChargePoint), James M. Van Nostrand, respectfully requests the Presiding Administrative Law Judge to enter an Order granting admission *pro hac vice* to Scott Dunbar as counsel for ChargePoint for all purposes in relations to this proceeding. In support of this Motion, the Movant, James M. Van Nostrand, avers as follows:

1. I am an active member of the Pennsylvania Bar (Attorney No. 327054). Pursuant to PUC Rule 1.24, I have entered my appearance as counsel of record for ChargePoint in this proceeding.

2. Scott Dunbar is an attorney employed by Keyes & Fox, LLP, which is located at 1580 Lincoln St., Suite 1105, Denver, CO 80203. He is a graduate of the University of Colorado School of Law. He was admitted to practice law in the State of Colorado in 2012 and is currently on active status and is in good standing (Attorney No. 44521). Mr. Dunbar has experience with proceedings before state utility commissions in Colorado, Oregon,

Hawaii, Minnesota, Nevada, Illinois, New Mexico, Wisconsin, Missouri, Iowa, and Pennsylvania. Mr. Dunbar has never been suspended, disbarred or been the subject of disciplinary proceedings in Pennsylvania or any other state.

3. Mr. Dunbar 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. Mr. Dunbar agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during his appearance in this matter.

4. Mr. Dunbar has consented to the appointment of James M. Van Nostrand as his sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record on behalf of ChargePoint.

WHEREFORE, James M. Van Nostrand, Movant and Counsel of Record for ChargePoint, respectfully moves for the admission of Scott Dunbar to appear in this matter *pro hac vice* for ChargePoint for all permissible purposes in relation to this proceeding.

Date: June 2, 2021

/s/ James M. Van Nostrand  
James M. Van Nostrand  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3024750
	:	
Duquesne Light Company	:	

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

I, James M. Van Nostrand, state the following:

1. After reasonable investigation, I reasonably believe that Scott Dunbar is a responsible and competent attorney. Accordingly, I am in a position to recommend his admission *pro hac vice* in the above-captioned matter.
2. Any proceeds from the settlement of a cause of action in which the candidates are 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.
3. I shall remain the attorney of record for this case, as required by the Rules of Civil Procedure.
4. 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: June 2, 2021

*/s/ James M. Van Nostrand*

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Counsel for ChargePoint, Inc.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3024750
	:	
Duquesne Light Company	:	

**VERIFIED STATEMENT OF SCOTT DUNBAR FOR ADMISSION PRO HAC VICE**

Pursuant to 52 Pa. Code §§1.22(b) and 5.103 and Pa. Rule of Civil Procedure 1012.1, James M. Van Nostrand, a member of the bar of the Commonwealth of Pennsylvania (Pa. Attorney ID No. 327054), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor’s motion, I, the candidate, Scott Dunbar, submit this verified statement:

1. I am admitted to practice in and am a member in good standing of the bar of Colorado (Attorney No. 44521), having been admitted in 2012. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

2. I previously sought and received permission to appear *pro hac vice* in the Commonwealth of Pennsylvania in Public Utility Commission Case Nos. R-2018-3000164 and R-2021-3024601.

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, James M. Van Nostrand, 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: June 2, 2021

*/s/ Scott F. Dunbar*

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2021-3024750
	:	
Duquesne Light Company	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties by electronic mail.

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Date: June 2, 2021

*/s/ Alicia Zaloga* \_\_\_\_\_  
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