

**ELIZABETH J. SHER**  
Attorney at Law

One Jefferson Road  
Parsippany, NJ 07054-2891  
T: (973) 966-8214 F: (973) 210-8535  
esher@daypitney.com

*Via Electronic Filing*

March 8, 2024

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

**Re: Docket No. P-2024-3046008: Petition of PECO Energy Company for Approval of its  
Default Service Plan for the Period from June 1, 2025 through May 31, 2029**

Dear Secretary Chiavetta:

Enclosed please find Constellation NewEnergy, Inc. and Constellation Energy Generation LLC's Motion for Admission Pro Hac Vice in the above-captioned proceeding.

The parties shown on the attached Certificate of Service are being duly served with a copy of the enclosed Motion. Please do not hesitate to contact me if you have any questions or require additional information. Thank you.

Very truly yours,



Elizabeth J. Sher

Enclosure

cc: Administrative Law Judge Eranda Vero (via email)  
Administrative Law Judge Arlene Ashton (via email)  
Service List

**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 Section 1.54 (relating to service by a participant).

**BROOKE E MCGLINN ESQUIRE**  
**KENNETH M KULAK ESQUIRE\***  
**MAGGIE CURRAN ESQUIRE\*\***  
CATHERINE G VASUDEVAN ESQUIRE  
MORGAN LEWIS & BOCKIUS LLP  
1701 MARKET STREET  
PHILADELPHIA PA 19103-2921  
**215.963.5404**  
**215.963.5384**  
[bmcglinn@morganlewis.com](mailto:bmcglinn@morganlewis.com)  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)  
[catherine.vansudevan@morganlewis.com](mailto:catherine.vansudevan@morganlewis.com)

**ANTHONY GAY ESQUIRE**  
**JACK GARFINKLE ESQUIRE**  
EXELON  
2301 MARKET STREET  
LEGAL DEPARTMENT S23-1  
PHILADELPHIA PA 19103  
**215.841.4635**  
**856.912.4738**  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)  
[Jack.Garfinkle@exeloncorp.com](mailto:Jack.Garfinkle@exeloncorp.com)

**BRANDON PIERCE ESQUIRE**  
**ADESOLA ADEGBESAN ESQUIRE**  
PECO ENERGY COMPANY  
2301 MARKET STREET S23-1  
PHILADELPHIA PA 19103  
**267.533.0387**  
**267.533.2126**  
[adesola.adegbesan@exeloncorp.com](mailto:adesola.adegbesan@exeloncorp.com)  
[Brandon.Pierce@exeloncorp.com](mailto:Brandon.Pierce@exeloncorp.com)

**CHARIS MINCAVAGE ESQUIRE**  
**ADEOLU A BAKARE ESQUIRE**  
MCNEES WALLACE & NURICK  
100 PINE STREET  
PO BOX 1166  
HARRISBURG PA 17108  
**717.237.5437**  
**717.232.8000**  
**717.260.1744**  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)

**REBECCA LYTTLE ESQUIRE**  
**STEVEN C GRAY ESQUIRE**  
OFFICE OF SMALL BUSINESS  
ADVOCATE  
555 Walnut Street  
1ST FLOOR  
HARRISBURG PA 17101  
**717.783.2525**  
[relyttle@pa.gov](mailto:relyttle@pa.gov)  
[sgray@pa.gov](mailto:sgray@pa.gov)

**ELIZABETH R MARX ESQUIRE**  
**JOHN W SWEET ESQUIRE**  
**RIA M PEREIRA ESQUIRE**  
PA UTILITY LAW PROJECT  
118 Locust Street  
HARRISBURG PA 17101  
717-236-9486  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[jsweet@pautilitylawproject.org](mailto:jsweet@pautilitylawproject.org)  
[rpereira@pautilitylawproject.org](mailto:rpereira@pautilitylawproject.org)

**NAZAARAH SABREE**  
OFFICE OF SMALL BUSINESS  
ADVOCATE  
555 WALNUT STREET FORUM PLACE  
1ST FLOOR  
HARRISBURG PA 17101  
**717.783.2525**  
[ra-sba@pa.gov](mailto:ra-sba@pa.gov)

**BARRETT SHERIDAN ESQUIRE**  
**ANDREW J ZERBY**  
OFFICE OF CONSUMER ADVOCATE  
555 WALNUT STREET  
5TH FLOOR FORUM PLACE  
HARRISBURG PA 17101  
**717.783.5048**  
[bsheridan@paoca.org](mailto:bsheridan@paoca.org)  
[azerby@paoca.org](mailto:azerby@paoca.org)

**JOHN F LUSHIS JR**  
NORRIS MCLAUGHLIN PA  
515 W HAMILTON STREET  
SUITE 502  
ALLENTOWN PA 18101  
**610.391.1800**  
**484.547.1687**  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)

**CHRISTOPHER O'HERA**  
SENIOR VICE PRESIDENT  
PJM INTERCONNECTION  
2750 MONROE BOULEVARD  
AUDUBON, PA, 19403  
[Christopher.ohera@pjm.com](mailto:Christopher.ohera@pjm.com)

**DEANNE ODELL ESQUIRE**  
ECKERT SEAMANS CHERIN &  
MELLOTT LLC  
600 GRANT ST 44TH FL  
PITTSBURGH PA 15219  
**412.566.2146**  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)

**KAREN O'MOURY ESQUIRE**  
ECKERT SEAMANS CHERIN &  
MELLOTT LLC  
213 MARKET STREET 8TH FLOOR  
HARRISBURG PA 17101  
**717.237.6036**  
**717.571.1420**  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)

**ROBERT W BALLENGER ESQUIRE**  
**JOLINE PRICE ESQUIRE**  
COMMUNITY LEGAL SERVICES INC  
1424 CHESTNUT STREET  
PHILADELPHIA PA 19102  
**215.981.3788**  
**215.981.3756**  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)



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Elizabeth J. Sher  
Counsel to Constellation NewEnergy, Inc.  
and Constellation Energy Generation LLC

Dated this 8<sup>th</sup> day of March 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company  
for Approval of Its Default Service Program  
for the Period From June 1, 2025 Through  
May 31, 2029

Docket No. P-2024-3046008

**MOTION FOR ADMISSION PRO HAC VICE OF  
CONSTELLATION NEWENERGY, INC.  
AND CONSTELLATION ENERGY GENERATION, LLC**

Pursuant to 52 Pa. Code §§ 1.22 and 5.103, 231 Pa. Code 1012.1, and Rule 301(b) of the Pennsylvania Bar Admission Rules, and subject to the granting of its Petition to Intervene filed on March 6, 2024, Constellation NewEnergy Inc. and Constellation Energy Generation, LLC (“Constellation”) hereby submit this Motion for Admission Pro Hac Vice. The undersigned attorney of record for Constellation, Elizabeth J. Sher, respectfully requests an Order granting admission *pro hac vice* to Alexander Judd and Sophia Browning as counsel for Constellation for all purposes in relation to the above-captioned proceeding. In support of this Motion, Constellation states as follows:

1. Elizabeth J. Sher is an active member of the Bar of the Pennsylvania Supreme Court (Attorney No. 207853) and has entered her appearance as counsel of record for Constellation in this matter pursuant to 52 Pa. Code § 1.24(b)(1).
2. Alexander Judd is a Partner at the law firm of Day Pitney LLP, with an office located at 225 Asylum St., Hartford, CT 06103, and serves as counsel for Constellation. He is admitted to practice law in Connecticut (Attorney ID: 434037) and is currently in good standing. Mr. Judd has never been suspended or disbarred by any jurisdiction.

3. Sophia Browning is a Senior Associate at the law firm of Day Pitney LLP, with an office located at 555 11<sup>th</sup> St. NW, Washington, DC 20004, and serves as counsel for Constellation. She is admitted to practice law in California (Attorney ID 317152) and Washington DC (Attorney ID: 1602209) and is currently in good standing. Ms. Browning has never been suspended or disbarred by any jurisdiction.
4. Mr. Judd and Ms. Browning agree to be bound by and comply with the 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. Judd and Ms. Browning agree to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during their respective appearances in this matter.
5. Mr. Judd and Ms. Browning have consented to the appointment of Elizabeth J. Sher as their sponsor, who has filed their notice of appearance in this matter and who will remain counsel of record on behalf of Constellation.

WHEREFORE, Constellation respectfully moves for the admission of Alexander Judd and Sophia Browning to appear in this matter *pro hac vice* for Constellation for all permissible purposes in relation to this proceeding.

Respectfully submitted,

/s/ Elizabeth J. Sher

Elizabeth J. Sher  
Attorney No. 207853  
One Jefferson Road  
Parsippany, NJ 07054-2891  
(973) 966-8214  
[esher@daypitney.com](mailto:esher@daypitney.com)

*Attorney for Constellation  
NewEnergy Inc. and Constellation  
Energy Generation, LLC*

Dated: March 8, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company  
for Approval of Its Default Service Program  
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May 31, 2029

Docket No. P-2024-3046008

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

I, Elizabeth J. Sher, state the following:

1. I am a member of good standing with the Bar of the Supreme Court of Pennsylvania (Attorney ID: 207853) and am acting as sponsor for the admission *pro hac vice* of Alexander Judd and Sophia Browning to appear before the Pennsylvania Public Utility Commission in this matter.
2. I have known Mr. Judd and Ms. Browning for more than four years, and based on my experience and upon reasonable investigation, I believe both to be reputable and competent attorneys, and I am in a position to recommend Mr. Judd and Ms. Browning for admission *pro hac vice*.
3. I am sponsoring Mr. Judd and Ms. Browning's admissions *pro hac vice* in this matter.
4. I am not acting as the sponsor for any other candidate before this Commission or otherwise in the Commonwealth of Pennsylvania.
5. Any proceeds from the settlement of a cause of action in which Mr. Judd and/or Ms. Browning 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.

6. I shall remain the attorney of record for this case, in accordance with the Pennsylvania Rules of Civil Procedure.
7. 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).

Respectfully submitted,

/s/ Elizabeth J. Sher

Elizabeth J. Sher  
One Jefferson Road  
Parsippany, NJ 07054-2891  
(973) 966-8214  
[esher@daypitney.com](mailto:esher@daypitney.com)

*Attorney for Constellation  
NewEnergy Inc. and Constellation  
Energy Generation, LLC*

Dated: March 8, 2024



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company  
for Approval of Its Default Service Program  
for the Period From June 1, 2025 Through  
May 31, 2029

Docket No. P-2024-3046008

**VERIFIED STATEMENT OF ALEXANDER JUDD  
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

I, Alexander Judd, state the following:

1. I am admitted to practice in, and am a member in good standing of, the bar of Connecticut (Attorney ID: 434037). I have never been suspended, disbarred, or otherwise disciplined, nor am I currently the subject of any disciplinary proceeding.
2. I have not applied for admission *pro hac vice* before the Commission previously. I have not applied for *pro hac vice* admission in any other actions in Pennsylvania. As such, I have never been denied admission *pro hac vice* in any courts of record in Pennsylvania.
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 my appearance in this matter.

5. I consent to the appointment of the sponsoring attorney, Elizabeth J. Sher, 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 this matter.
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).

Respectfully submitted,

/s/ Alexander Judd

Alexander Judd  
Day Pitney LLP  
225 Asylum St.  
Hartford, CT 06103  
(860) 275-0147  
[ajudd@daypitney.com](mailto:ajudd@daypitney.com)

Dated: March 8, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company  
for Approval of Its Default Service Program  
for the Period From June 1, 2025 Through  
May 31, 2029

Docket No. P-2024-3046008

**VERIFIED STATEMENT OF SOPHIA BROWNING  
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

I, Sophia Browning, state the following:

1. I am admitted to practice in, and am a member in good standing of, the bars of California (Attorney ID: 31715) and Washington DC (Attorney ID: 1602209). I have never been suspended, disbarred, or otherwise disciplined, nor am I currently the subject of any disciplinary proceeding.
2. I have not applied for admission *pro hac vice* before the Commission previously. I have not applied for *pro hac vice* admission in any other actions in Pennsylvania. As such, I have never been denied admission *pro hac vice* in any courts of record in Pennsylvania.
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 my appearance in this matter.

5. I consent to the appointment of the sponsoring attorney, Elizabeth J. Sher, 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 this matter.
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).

Respectfully submitted,

/s/ Sophia Browning \_\_\_\_\_

Sophia Browning

Day Pitney LLP

555 11<sup>th</sup> St. NW

Washington, DC 20004

(202) 218-3904

[sbrowning@daypitney.com](mailto:sbrowning@daypitney.com)

Dated: March 8, 2024