

515 West Hamilton Street Suite 502 Allentown, PA 18101

T: 610-391-1800 F: 610-391-1805

jlushis@norris-law.com

June 2, 2020

## **E-FILE**

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

> RE: Petition of Duquesne Light Company for Approval of a Default Service Plan for the Period June 1, 2021 through May 31, 2025 Docket No. P-2020-3019522

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Admission Pro Hac Vice of James H. Laskey on behalf of Calpine Retail Holdings, LLC in the above-referenced proceeding.

All parties are asked to include Mr. Laskey on their e-service list, at <u>jlaskey@norrislaw.com</u>.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Sincerely,

NORRIS McLAUGHLIN, P.A.

/s/John F. Lushis, Jr.

John F. Lushis, Jr.

c: Deputy Chief Administrative Law Judge Mark A. Hoyer (via e-mail) Certificate of Service

**Petition of Duquesne Light Company for:** 

**Approval of Default Service Plan for** :

the Period of June 1, 2021 through : Docket No. P-2020-3019522

May 31, 2025 :

MOTION FOR ADMISSION PRO HAC VICE OF JAMES H. LASKEY ON BEHALF OF CALPINE RETAIL HOLDINGS, LLC

I, John F. Lushis, an attorney in good standing and authorized to practice in the

Commonwealth of Pennsylvania, hereby move the Pennsylvania Public Utility Commission, in

accordance with 52 Pa. Code § 1.22(b), the Pennsylvania Bar Admission Rule 204 Pa. Code § 301,

and the Pennsylvania Rule of Civil Procedure 1012.1(c) to permit James H. Lasky, a member of

New Jersey (Attorney I.D. No. 016311978) to appear pro hac vice in the above captioned matter

on behalf of Calpine Retail Holdings, LLC. The Verified Statement of James H. Lasky is attached

to and relied upon in support of this Motion.

I hereby certify that copies of this Motion and the attached Verified Statements have been

served upon all parties of record in the above-captioned matter.

Dated: <u>June 2, 2020</u> /s/ **John F. Lushis, Jr.** 

John F. Lushis, Esquire Attorney I.D. No. 32400 Norris McLaughlin, P.A. 515 W Hamilton Ste 502 Allentown, PA 18101 (484) 765-2211

ilushis@norris-law.com

Attorneys for Calpine Retail Holdings, LLC

**Petition of Duquesne Light Company for:** 

Approval of Default Service Plan for

the Period of June 1, 2021 through : Docket No. P-2020-3019522

May 31, 2025 :

#### VERIFIED STATEMENT OF JOHN F. LUSHIS

I, John F. Lushis, hereby state as follows:

- 1. I am counsel for Calpine Retail Holdings, LLC in the Commonwealth of Pennsylvania.
- 2. I am admitted to practice law in the Commonwealth of Pennsylvania and am in good standing with all courts and administrative agencies of the Commonwealth.
  - 3. I regularly practice before the Pennsylvania Public Utility Commission.
- 4. I have never been suspended, disbarred, or disciplined by a court or administrative agency, nor am I subject to any proceeding for suspension, disbarment, or disciplinary action.
- 5. After reasonable investigation, I reasonably believe James H. Laskey, the candidate for admission *pro hac vice* before the Pennsylvania Public Utility Commission, to be a reputable and competent attorney.
  - 6. I am in a position to recommend the admission *pro hac vice* of James H. Laskey.
- 7. If there should be any proceeds from the settlement of this proceeding, such proceeds 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, if applicable.

8. The foregoing statements are true 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.

Dated: <u>June 2, 2020</u>

/s/ John F. Lushis, Jr.
John F. Lushis, Esquire
Attorney I.D. No. 32400
Norris McLaughlin, P.A.
515 W Hamilton Ste 502
Allentown, PA 18101
(484) 765-2211
jlushis@norris-law.com
Attorneys for Calpine Retail Holdings, LLC

**Petition of Duquesne Light Company for:** 

**Approval of Default Service Plan for** :

the Period of June 1, 2021 through : Docket No. P-2020-3019522

May 31, 2025 :

#### VERIFIED STATEMENT OF JAMES H. LASKEY

52 Pa. Code § 1.22(b), the Pennsylvania Bar Admission Rule 204 Pa. Code § 301, and the Pennsylvania Rule of Civil Procedure 1012.1(c), John F. Lushis, Esquire, a member of the Bar of the Commonwealth of Pennsylvania (Attorney I.D. No. 32400), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, James H. Laskey, submit this verification, pursuant to Pa.R.C.P. No. 1012.1:

- 1. I am admitted to practice and am a member in good standing of the Bar in the State of New Jersey (Attorney I.D. No. 016311978).
- 2. I have never been suspended, disbarred, or otherwise disciplined, nor am I currently the subject of any disciplinary proceeding.
- 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, and shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to the acts and omissions occurring during the appearance in the matter for which *proc hac vice* is being sought.
- 4. I do consent to the appointment of the sponsoring attorney, John F. Lushis, 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.

5. If there should be any proceeds from the settlement of this proceeding, such proceeds 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 verify that the foregoing statements are true to the best of my knowledge, information, and belief. I understand that the statements are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Dated: June 2, 2020

James H. Laskey, Esquire
NJ Attorney I.D. No. 016311978
Norris McLaughlin, P.A.
400 Crossing Blvd 8<sup>th</sup> Fl
Bridgewater Township, NJ 08807
(908) 252-4221
jlaskey@norris-law.com
Attorneys for Calpine Retail Holdings, LLC

Petition of Duquesne Light Company for Approval of Default Service Plan for the Period of June 1, 2021 through May 31, 2025	: Docket No. P-2020-3019522
ORDER GRANTING MOTION FOR ADMISSION PRO HAC VICE OF JAMES H. LASKEY	
Upon consideration of Motion for A	Admission pro hac vice of James H. Laskey, it is this
of, 2020,	
ORDERED that the Motion is hereb	by GRANTED; and it is further
ORDERED that James H. Laskey is	admitted pro hac vice for the purposes of representing
Calpine Retail Holdings, LLC in the above-	captioned action.

Honorable Mark A. Hoyer Deputy Chief Administrative Law Judge

Petition of Duquesne Light Company for : Approval of Default Service Plan for :

the Period of June 1, 2021 through : Docket No. P-2020-3019522

May 31, 2025 :

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Motion for Admission Pro Hac Vice upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail as follows:

Honorable Mark A. Hoyer
Deputy Chief Administrative Law Judge
Pennsylvania Public Utility
Commonwealth Keystone Building
400 North Street, 2<sup>nd</sup> Floor
Harrisburg, PA 17120
Mhoyer@pa.gov

Michael Zimmerman
Tishekia E. Williams
Emily Farah
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219
mzimmerman@duqlight.com
twilliams@duqlight.com
efarah@duqlight.com

David T. Evrard
Kristine E. Robinson
Aron J. Beatty
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5<sup>th</sup> Floor
Harrisburg, PA 17101
devrard@paoca.org
krobinson@paoca.org
abeatty@paoca.org

Michael W. Gang Anthony D. Kanagy Post & Schell, P.C. 17 North Second Street, 12<sup>th</sup> Floor Harrisburg, PA 17101 mgang@postschell.com akanagy@postschell.com

Richard A. Kanaskie
Scott D. Granger
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2<sup>nd</sup> Floor West
P.O. Box 3265
Harrisburg, PA 17105
rkanaskie@pa.gov
sgranger@pa.gov

Sharon E. Web Office of Small Business Advocate 555 Walnut Street, 1<sup>st</sup> Floor Harrisburg, PA 17101 <a href="mailto:swebb@pa.gov">swebb@pa.gov</a> Elizabeth R. Marx John Sweet Ria Pereira Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@palegalaid.net Counsel for CAUSE-PA

Dated: June 2, 2020

/s/ John F. Lushis, Jr.
John F. Lushis, Esquire
Attorney I.D. No. 32400
Norris McLaughlin, P.A.
515 W Hamilton Ste 501
Allentown, PA 18101
Attorneys for Calpine Retail Holdings, LLC